

Agenda Item:

Regulatory Committee

6

Dorset County Council



Date of Meeting	Regulatory Committee - 5 September 2014
Officer	Head of Planning
Subject of Report	Navitus Bay Wind Park Local Impact Report
Executive Summary	<p>Through the National Infrastructure Planning process, Dorset County Council, as a local authority is invited to submit a Local Impact Report on the proposed Navitus Bay Wind Park development.</p> <p>This committee report presents a draft Local Impact Report which is based on the 'relevant representation' previously approved by Dorset County Council Planning Committee and Cabinet and sent to the Planning Inspectorate in June. Officers have examined the application and have provided views on the technical aspects of the project. The key issues are described in detail in this draft Local Impact Report, which is to be submitted to the Examining Authority by October 6th for consideration during the six month examination of the Navitus Bay application.</p>
Impact Assessment:	<p>Equalities Impact Assessment: This report concerns the submission of a Local Impact Report to the Examining Authority who have been selected to assess the Navitus Bay Wind Park application by the Secretary of State. The submission of a Local Impact Report is invited through Section 60 (2) of the Planning Act 2008 and has no implications in terms of changes to any new or existing policy with equalities implications.</p>
	<p>Use of Evidence: The recommendation has been made after consideration of government and local policy and guidance and local evidence in specific topic areas.</p>
	<p>Budget: The response to this consultation does not give rise to any budget implications for the Committee.</p>

	<p>Risk Assessment: As the subject matter of this report is a response to a Nationally Significant Infrastructure Planning application the Dorset County Council approved risk assessment methodology has not been applied.</p>
	<p>Other Implications: None</p>
<p>Recommendation</p>	<p>That, subject to any amendments it wishes to make, the Regulatory Committee recommends to the Cabinet the Local Impact Report on the Navitus Bay Wind Park Development application, as set out in Appendix 4 of this report, for submission to the Examining Authority.</p>
<p>Reason for Recommendation</p>	<p>In coming to a decision, the Secretary of State must have regard to any Local Impact Reports that are submitted by the deadline set by the Examining Authority. Local authorities are therefore strongly encouraged to produce Local Impact Reports when invited to do so. Given the strong feeling against this development by Dorset County Council, this will be one of the main avenues by which the Council can present its concerns to the Examining Authority and Secretary of State.</p>
<p>Appendices</p>	<ol style="list-style-type: none"> 1) Relevant Representation submitted to the Planning Inspectorate in June 2014 2) Timetable for the examination process 3) Initial assessment of principle issues 4) Dorset County Council Draft Local Impact Report
<p>Background Papers</p>	<p>Navitus Bay Wind Park Development Consent Order documents – April 2014 (CD)</p> <p>Navitus Bay Wind Park Application - Planning Committee/Cabinet report (3/4 June 2014)</p>
<p>Report Originator and Contact</p>	<p>Name: Dr Ken Buchan Tel: 01305 225132 Email: k.buchan@dorsetcc.gov.uk</p>

1. Background

- 1.1 On 10 April, 2014, Navitus Bay Development Limited submitted an application for an order granting development consent to the National Infrastructure Planning Unit of the Planning Inspectorate.
- 1.2 The development proposal comprises the construction and operation of up to 194 wind turbine generators with a maximum tip height of up to 200 metres, up to one meteorological mast, up to three offshore substation platforms, inter-array cables that collect and transfer power generated by the turbines to the offshore substation platforms and export cables that take the electricity generated by the turbines to shore.
- 1.3 The onshore electrical works consist of underground cables running from mean low water at Taddiford Gap between Barton-on-Sea and Milford-on-Sea in Hampshire to a new onshore substation adjacent to the National Grid substation at Mannington in Dorset and an underground connection between the two substations.
- 1.4 The wind farm is to be located on the bed of the English Channel approximately 17.3 km off Scratchell's Bay (south of the Needles on the Isle of Wight) and 14.4 km from Durlston Head. The Turbine Area occupies an area of 153 km².
- 1.5 As the proposed wind farm is expected to have a capacity of up to 970 MW, it is a Nationally Significant Infrastructure Project for the purposes of the Planning Act 2008, and will be determined by the Secretary of State.

2. The planning process

- 2.1 Now that an application from Navitus Bay Development Limited has been accepted for examination, the Secretary of State has appointed an 'Examining Authority' to examine the application. The Examining Authority is a panel of four inspectors from the Planning Inspectorate.
- 2.2 Dorset County Council submitted a short 'relevant representation' to the Planning Inspectorate in June 2014 following approval of the Planning Committee and Cabinet (See Appendix 1). This representation, along with approximately 2700 others from local authorities, other statutory organisations and members of the public, have now been assessed by the appointed Examining Authority.
- 2.3 A date has been made for a preliminary meeting which will set out the main topics for discussion during examination, and the time table for submission of more detailed written representations. In addition, dates have been set for topic specific hearings and submission of Local Impact Reports by local authorities and Statements of Common Ground by the developer. A draft timetable is presented in Appendix 2.
- 2.4 As part of the Planning Act 2008 process, the relevant local authorities are invited to submit a Local Impact Report giving details of the likely impact of the proposed development on the authority's area.
- 2.5 The report is to be used by local authorities as the means by which their existing body of local knowledge and evidence on local issues can be fully and robustly reported to the Examining Authority.

- 2.6 By setting out clearly evaluated impacts in a structured document, local authorities will assist the Examining Authority by identifying local issues which might not otherwise come to its attention in the examination process. It is also an opportunity to present an appraisal of the proposed development's compliance with local policy and guidance.
- 2.7 The Local Impact Report must be submitted to the Planning Inspectorate by 6 October. It is being reported to members now to allow the draft to be considered by Regulatory Committee and Cabinet. Cabinet will be asked to approve the draft and to allow the Director for Environment and the Economy in consultation with the portfolio holder to make further amendments if circumstances change before 6 October, for example further evidence is provided by NBDL on a particular issue.
- 2.8 The examination is scheduled to last six months following the preliminary meeting, and after 11 March 2015 the Examining Authority will have three months to make their recommendation to the Secretary of State for Energy and Climate Change, who will take a decision on whether or not to make a development consent order (DCO) authorising the project.

3. Key Issues

- 3.1 The Examining Authority has made an initial assessment of the principle issues arising from the Relevant Representations submitted by all interested parties. Although not a comprehensive or exclusive list of all relevant matters, the list outlines key elements of the Navitus Bay proposal which will be scrutinised through the examination process (see Appendix 3).
- 3.2 For Dorset County Council, the key issues included in the draft Local Impact Report (see Appendix 4) are:
- seascape and landscape visual impact assessment
 - potential impact on World Heritage status for the Jurassic Coast
 - the historic and cultural heritage of Durlston Castle and landscape
 - environmental impacts – effects on terrestrial and freshwater ecology
 - seabed geology and the suitability of chalk as a medium in which to place turbine foundations
 - highways, traffic and transport issues
 - tourism and other socio-economic impacts
- 3.3 The Local Impact Report is also an opportunity to comment on articles, requirements and obligations in the draft Development Consent Order and to suggest others that should be included.
- 3.4 In the relevant representation submitted to the Planning Inspectorate in June, Dorset County Council Members requested that special attention should be given by the Examining Panel to scrutinising other areas of concern. These are issues of bird migration/strike, noise, the effect of turbines on microclimate, the potential impacts of electromagnetic radiation, and the impacts to recreational sailing and commercial fishing. We also requested that the Examining Authority considers the actual likely

energy output from the development in order to assess the true benefits against the costs.

- 3.5 Most of the County Council's issues and concerns have been identified as principal issues by the Examining Authority (Appendix 3) although there is acknowledgement that this list is not completely comprehensive. Organisations and individuals with particular expertise in these areas will be called upon to present their concerns and the evidence which supports their view during the Examination.
- 3.6 Not included in this list is specific mention of the Council's comments on the suitability of chalk as a foundation for turbines and the fact that this should not be a constraint to moving the development further offshore. This point will be made through the discussions on the visual aspects of the proposal.
- 3.7 The other area not considered as a principle issue for the Examining Authority is the Council's view on the actual likely energy output of the development. On further investigation, the 970 MW energy generation claim by the developer refers to the potential output of energy when all turbines are operating to full capacity. This figure is likely to be accurate. The issue of how efficient offshore wind is at generating power is more accurately calculated by looking at annual energy output in Megawatt Hours. Generally offshore wind will generate energy at the equivalent of full power for 30 – 35% of the time. This has been factored into the developer's calculation that the Navitus Bay development will supply energy equivalent to that needed to power approximately 700,000 average UK households. This is the standard method used by the industry to calculate and present potential output.

4. Conclusion

- 4.1 The request for a Local Impact Report provides an important opportunity for Dorset County Council to set out its concerns over the proposed Navitus Bay development. The content of the Local Impact Report will be scrutinised closely by the Examining Authority and the Secretary of State.
- 4.2 Dorset County Council will also be asked to respond in detail to specific questions from the Examining Authority through written representations and at topic specific hearings.
- 4.3 Members are being asked to consider the proposed Local Impact Report and, subject to any amendments they wish to make, recommend the Report to the Cabinet for submission to the Examining Authority.

Don Gobbett
Head of Planning
September 2014

Appendix 1 – Dorset County Council Relevant Representation on the Navitus Bay Wind Park Development Application to the Examining Authority of the Planning Inspectorate

Dorset County Council (DCC) strongly objects to this proposal on the following grounds:

SEASCAPE AND LANDSCAPE VISUAL IMPACT ASSESSMENT (SLVIA)

The Developer has played-down the adverse landscape and visual impact of the project in a highly sensitive setting. The Dorset Area of Outstanding Natural Beauty will be significantly affected by the development. The nature and extent of significant effects are not fully recognised by the SLVIA.

There is genuine public and business concern about the visual impact of the proposed wind park. Many feel that the photomontage visualisations accompanying the application do not represent the worst case scenario and therefore fail to provide a realistic indication of what the wind park may look like.

The developers Environmental Statement recognises that there are residual impacts which are significant under Environmental Impact Assessment regulations but there are no further mitigation and/or compensation measures addressed.

DCC are concerned about the protection, conservation and long term enhancement of natural and historic landscape features which may be affected by the onshore route corridor. The identification, protection and/or remediation of these features needs to be agreed and comprehensively detailed.

IMPACT ON WORLD HERITAGE STATUS FOR THE JURASSIC COAST

Dorset County Council draws attention to the letter from UNESCO sent to the Planning Inspectorate on 2 May 2014. We endorse the position statement of the Jurassic Coast World Heritage Site Steering Group (WHSSG):

- 1) The WHSSG considers that there is likely to be adverse impacts on the processes that maintain the Outstanding Universal Value of the Site through reductions of wave action because of the proposed development, but the extent and magnitude of these impacts will likely be insignificant. However, there remains uncertainty regarding changes to the behaviour of 'high magnitude low frequency' events, and more information is needed.
- 2) The WHSSG consider that there will be a significant adverse impact in the manner in which the Site is presented
- 3) The WHSSG also consider that there would be a significant adverse impact on the setting in the context of the cultural and sensory experience, and that the proposed development would substantially modify views along and from the Site through the introduction of man-made, not natural structures.

THE HISTORIC AND CULTURAL HERITAGE OF DURLSTON CASTLE AND LANDSCAPE

The Developer's assessment of impacts on Durlston Castle and its environs fails to fully grasp the essential concept that this is more than a series of coastal viewpoints, but is a unique visionary historic environmental asset. Durlston also has the highest Dark Sky Discovery Site classification for viewing the night sky and we have concerns over the impact of additional lighting introduced by the development.

SEABED GEOLOGY – SUITABILITY OF CHALK

NBDL had previously maintained that Chalk is 'too soft' for foundations that penetrate the sea bed, but may now consider placing a proportion of the turbines on Chalk using space frame foundations. The Council believes that Chalk is not a constraint to placing the wind farm further offshore to reduce visual impact.

DIRECT LOSS OF DESIGNATED HABITAT

The onshore development would lead to the loss of habitat within the Dorset Heaths SAC, Dorset Heathlands SPA and Ramsar. Under the Habitats Regulations, the loss of habitat would be a likely 'significant effect', adversely affecting the integrity of the European sites.

TOURISM AND OTHER SOCIO ECONOMIC IMPACTS

The potential for job creation and economic growth from the Navitus Bay Wind Park is noted, and could support the Council's corporate priority to support economic growth and jobs. However, significant uncertainty remains regarding supply chain analysis which makes forecasting potential benefits difficult. There is significant concern regarding the adverse impact upon Dorset's tourism sector, particularly in Purbeck, and the inadequacy of the visual representations used to assess that impact.

OTHER MATTERS

The Examining Authority is asked to investigate thoroughly the issues of bird migration/strike, noise, the effect of turbines on microclimate, the potential impacts of electromagnetic radiation, and the impacts to recreational sailing and commercial fishing.

The people of Dorset are being asked to accept a fundamental change to the natural coastal environment yet there appears to be little consideration over the actual likely energy output from this development. We would ask that the Examining Authority apply particular scrutiny to this and test the assertion of the developer that the wind farm will produce 970 MW of power in order that the true benefits can be assessed against the costs.

Appendix 2 – Draft Timetable for Examination of the Navitus Bay Wind Park Development Application

Draft timetable for examination of the application

The Examining Authority's (ExA) examination of the application takes the form of consideration of written representations about the application. The ExA will also consider any oral representations made at the hearings. The ExA is under a duty to **complete** the examination of the application by the end of the period of 6 months beginning with the day after the close of the Preliminary Meeting.

Item	Matters	Due Dates
1.	Preliminary Meeting Deadline for receipt of : Notice of wish to be heard at an open-floor hearing (mainland) – see Annex G	Thursday 11 September 2014
2.	Issue by ExA of: • Examination timetable • Examining Authority's first written questions • Notification of the date, time and place of the open floor hearing (mainland).	Monday 22 September 2014
3.	DEADLINE I Deadline for receipt of: • Local Impact Reports – see Annex G • Statements of Common Ground (SoCG) requested by ExA (see Annex H) • Receipt of the technical annexes of Chapter 16 (Shipping and Navigation), Volume B of the Environmental Statement Annex A – Consequences Assessment Report Annex B – Hazard Log Annex C – Navitus Bay MGN Checklist	Monday 6 October 2014
4.	Date reserved for open floor hearing (mainland)	Tuesday 14 October 2014
5.	DEADLINE II Deadline for receipt of: • Comments on relevant representations (RRs) • Summaries of all RR's and comments exceeding 1500 words Written representations (WRs) by all interested parties • Summaries of all WRs exceeding 1500 words • Responses to ExA's first written questions • Notice of wish to be heard at an open-floor hearing (Isle of Wight) • Notice of wish to be heard at issue-specific hearings • Nominations of additional locations to be inspected during site inspections and the features to be observed there, with reasons for each nomination	Monday 20 October 2014
6.	Issue by ExA of: • Notification of date, time and place for issue-specific hearings and open-floor hearings in the Isle of Wight	Friday 24 October 2014
7.	DEADLINE III Deadline for receipt by the ExA of: • Responses to comments on RR's • Comments on WRs • Comments on responses to ExA's written questions • Comments on Local Impact Reports	Wednesday 5 November 2014

Item	Matters	Due Dates
8.	Issue by ExA of: • Notification of date, time and place of accompanied site visits	Monday 10 November 2014
9.	Dates reserved for issue-specific hearings relating to the following indicative topics : • Landscape, Seascape and Visual Impacts and Design, • Offshore and Onshore Heritage and Built Environment, • Marine and Coastal Physical Processes: Sediments Dynamics, Waste and Debris, • Biodiversity, Biological Environment and Ecology	Tuesday 18, Wednesday 19 & Thursday 20 November 2014
10.	Date reserved for issue-specific Hearings relating to the following indicative topics: • Commercial Fisheries and Fishing, • Noise, Vibration, Electromagnetic Field and Health Impacts, • Offshore Water Quality, Offshore and Onshore Air Quality • Operational and Navigational Safety • Highways, Traffic and Transportation • Drainage and Water Supply • Socio- Economic Impacts • DCO, Assessment Approach and Policy background	Tuesday 25 Wednesday 26 & Thursday 27 November 2014
11.	Time reserved for accompanied site visits (IoW)	Tuesday 2 December 2014 (AM)
12.	Time reserved for open floor hearing (IoW)	Tuesday 2 December 2014 (PM)
13.	Date reserved for accompanied site visits	Wednesday 3 December 2014
14.	Date reserved for accompanied site visits	Thursday 4 December 2014
15.	DEADLINE IV Deadline for receipt by the ExA of: • Post hearing documents including any written summary of an oral case put at any hearing and any documents/amendments requested by the ExA	Thursday 11 December 2014
16.	DEADLINE V Deadline for receipt by the ExA of: • Applicant's revised draft DCO taking account of issues raised in hearings and WRs	Wednesday 7 January 2015
17.	Issue by ExA of: • Possible second written questions if required	Wednesday 14 January 2015
18.	Date reserved for issue-specific hearings relating to : • Development Consent Order and Deemed Marine Licence	Wednesday 21 January 2015
19.	Date reserved for Compulsory Acquisition Hearing	Thursday 22 January 2015

Item	Matters	Due Dates
20.	<p>DEADLINE VI</p> <p>Deadline for receipt by the ExA of:</p> <ul style="list-style-type: none"> • Responses to ExA's second written questions • Post hearing documents including any written summary of an oral case put at any hearing and any documents/amendments requested by the ExA • Comments on the applicants revised DCO 	<p>Thursday 29 January 2015</p>
21.	<p>Publication by ExA of:</p> <ul style="list-style-type: none"> • A Report on the Implications for European Sites (RIES) taking issues raised and comments into account • Revised draft DCO taking issues raised and comments into account • Any further requests for information 	<p>Tuesday 24 February 2015</p>
22.	<p>DEADLINE VII</p> <p>Deadline for receipt of:</p> <ul style="list-style-type: none"> • Comments on ExA's revised draft DCO • Comments on responses to ExA's second written questions • Comments on ExA's RIES • Receipt of any further information as requested at item 21 (if required) 	<p>Thursday 5 March 2015</p>
23.	<p>The ExA is under a duty to complete the examination of the application by the end of the period of 6 months beginning with the day after the close of the Preliminary Meeting.</p>	<p>Wednesday 11 March 2015</p>

Appendix 3 – Initial assessment of principal issues

This is the initial assessment of the principal issues arising from consideration by the Examining Authority of the application documents and relevant representations received. It is not a comprehensive or exclusive list of all relevant matters. Documentation from the Planning Inspectorate states that the Examining Authority will have regard to all important and relevant matters when it writes its recommendation to the Secretary of State after the examination has concluded.

1. Development Consent Order, Assessment Approach and Policy Background
2. Biodiversity, Biological Environment and Ecology
3. Commercial Fisheries and Fishing
4. Marine and Coastal Physical Processes: Sediment Dynamics, Waste and Debris
5. Noise, Vibration, Electro-magnetic Field and Health Impacts
6. Offshore Water Quality, Offshore and Onshore Air Quality
7. Operational and Navigational Safety
8. Offshore and Onshore Heritage and Built Environment including World Heritage Site
9. Landscape, Seascape, Visual Impacts and Design
10. Highways, Traffic, Transportation
11. Drainage and Water Supply
12. Socio – Economic Impacts
13. Trans-boundary Impacts
14. Compulsory Powers

Appendix 4 – Draft Dorset County Council Navitus Bay Wind Park Local Impact Report

DORSET COUNTY COUNCIL

NAVITUS BAY WIND PARK

LOCAL IMPACT REPORT

An application by Navitus Bay Development Ltd for an order granting development consent to construct and operate a wind park off the coasts of Dorset, Hampshire and the Isle of Wight has been accepted for examination by the Planning Inspectorate.

The Navitus Bay Wind Park would comprise up to 194 turbines, generating a maximum installed capacity of 970 MW of electricity. The wind turbines and associated offshore infrastructure, comprising 3 offshore substations and a meteorological mast, would occupy an area of 153 km².

The proposed turbine area is located at its closest 14.4 km or approximately 9 miles south and east of Durlston Head on the Purbeck coast. An offshore export cable corridor would connect the wind park to a landfall in Hampshire. From there, an onshore cable corridor would provide the link to a new electricity sub-station near to the existing Mannington sub-station in East Dorset. Connection to the National Grid would finally be made at the Mannington sub-station.

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1. INTRODUCTION

- 1.1.1 This report has been prepared by Dorset County Council in accordance with the requirements of the Planning Act 2008 and follows advice from the National Infrastructure Directorate of the Planning Inspectorate and that contained within the relevant National Policy Statements for Energy.
- 1.1.2 The Planning Act 2008 defines that the purpose of a Local Impact Report (LIR) is to draw to the attention of an Examining Authority details of the likely impact of a proposed development on an authority's area, or any part of that area.
- 1.1.3 Although the statutory definition provides a wide remit for preparing a LIR, Planning Inspectorate guidance cautions on a range of matters that the Examining Authority may find irrelevant to their consideration. Advice makes clear, for instance, that it will be unnecessary to include in the LIR matters which will already be known to the Authority, such as rehearsing the process itself for examining major proposals or replicating assessments required of the applicant by the relevant National Policy Statements for Energy. Finally, it may be unnecessary to include in the LIR a detailed and lengthy description of the proposal, the site and its surroundings, as this information will also be known to the Examining Authority.
- 1.1.4 Bearing the above in mind, the format of this report is as follows:
- A brief introduction to Dorset's unique **context and setting**.
 - A clear summary statement at the outset of what the County Council regards as the **most significant impacts** of the Navitus Bay Wind Park proposal.
 - An examination of the **policy context** for the proposal.
 - **Major issues** and impacts.
 - **Additional issues** and impacts.
 - Assessment of the **Development Consent Order** proposed articles, requirements and obligations.

2. DORSET'S UNIQUE CONTEXT AND SETTING

- 2.1.1 The people of Dorset live in a healthy natural environment which is the foundation of a successful economy, thriving communities and personal well-being.
- 2.1.2 Many counties may point to the quality of their environment, but Dorset can rightly claim an exceptional and unrivalled superabundance of environmental assets of international, national and local importance. Dorset (with East Devon) has the only natural World Heritage Site in England. It has two Areas of Outstanding Natural Beauty, covering 53% of the County. With Bournemouth and Poole, Dorset is the home to 85% of all species of mammals living in Britain, 90% of birds, 80% of butterflies, 70% of dragonflies and nearly all our reptiles.
- 2.1.3 The entire length of the Dorset coast, excluding the town seafronts, is recognised in national or international designations for its unique landscape, scenic quality, wildlife and geological formations. Figure 1 graphically illustrates the wealth and plethora of terrestrial and marine designations.

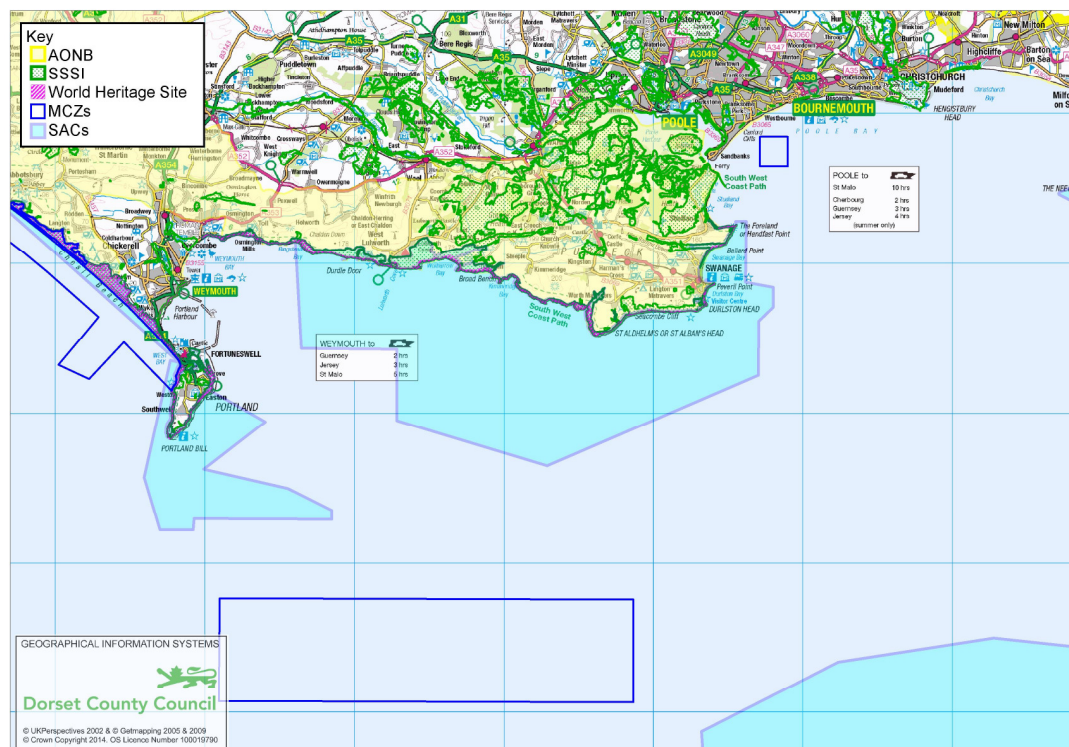


Figure 1. Terrestrial and Marine Designations in South Dorset

- 2.1.4 Dorset's high quality natural and historic environment and coast underpins economic and social well-being in the County and presents opportunities for employment, involvement, learning and leisure. This provides a rationale for its continued good management as well as protection for its own sake. However, the importance of the natural environment also places constraints and huge responsibility on decision makers regarding the location of new development. Dorset's natural systems provide a wide range of essential goods (food, fuel, productive soil, clean air and water) and beneficial services (pollination, flood alleviation, climate regulation and tranquillity). These are often taken for granted, but all require a combination of public, private and voluntary action to maintain them.
- 2.1.5 Dorset's environment is a significant economic generator in its own right, but offers further opportunities for sustainable growth, with green technology, energy and tourism all providing potential for development. Developing a low-carbon economy across all business sectors and making more efficient use of resources offers major economic opportunities as well as environmental benefits. Local procurement, particularly from smaller firms, keeps money in the local economy and helps to support existing jobs and create new jobs through supply chain activity and multipliers.
- 2.1.6 The County Council believes that Dorset as a County will be adversely affected by the Navitus Bay Wind Park, and not just on the coastline from which it would be visible. The economic prosperity and environmental distinctiveness of the County is bound by the whole and any adverse change has a knock-on effect throughout all parts.

3. SUMMARY OF SIGNIFICANT ISSUES AND IMPACTS

3.1 SEASCAPE AND LANDSCAPE VISUAL IMPACT ASSESSMENT (SLVIA)

- 3.1.1 The County Council believes that the Developer has under assessed the adverse seascape, landscape and visual effects of the project, which principally affect locations within the Dorset Area of Outstanding Natural Beauty (AONB). The offshore turbines would adversely affect the setting of the Dorset AONB and weaken qualities that make it a nationally treasured place.
- 3.1.2 The Dorset AONB should receive the highest level of protection from harmful development, as recognised by the NPPF. The Area provides an unrivalled expression of the interaction of geology, human influence and natural processes in the landscape. In particular, it has an exceptional undeveloped coastline, renowned for its spectacular scenery, geological interest and unique coastal features. Locations within the AONB that would be significantly adversely affected include assets of international significance and value, namely the Jurassic Coast World Heritage Site (WHS) and the Purbeck Heritage Coast, which holds the Council of Europe Diploma of Protected Areas. The extremely high sensitivity of such areas is of central concern. Given the importance of the Purbeck coast and its hinterland, significant and intrusive changes to coastal scenery are unacceptable. This concern extends to the presentation of the WHS.
- 3.1.3 The SLVIA's assessments relevant to the Dorset AONB underestimate the significant effects that would arise. This includes the geographic extent across which significant effects will be received and the overall impact on the AONB. The adversely affected areas are of such importance in their expression of key qualities and characteristics that the harm produced would weaken the AONB to an unacceptable degree. Considerable weight should be given to the importance of maintaining the unity or soundness of the whole designated area and the central and defining importance of areas such as the Purbeck coast.
- 3.1.4 The SLVIA identifies significant effects on a substantial area of the Dorset AONB. However, there will also be wider significant effects on character and views, including Studland Beach, views from recognised and promoted viewpoints on Brownsea Island, views from the Purbeck Hills and the experience of coastal character from locations to the west of St. Aldhelm's Head, extending to Worbarrow Tout.
- 3.1.5 There is genuine public and business concern about the visual impact of the proposed wind park. Many feel that the photomontage visualisations accompanying the application do not represent the worst case scenario and therefore fail to provide a realistic indication of what the wind park may look like if built in the proposed location.
- 3.1.6 The Developer's Environmental Statement recognises that there are residual impacts which are significant under Environmental Impact Assessment regulations but there are no further mitigation and/or compensation measures addressed.

3.2 IMPACT ON WORLD HERITAGE STATUS FOR THE JURASSIC COAST

3.2.1 Dorset County Council draws attention to the letter from UNESCO sent to the Planning Inspectorate on 2 May 2014¹. The Council endorses the position statement of the Jurassic Coast World Heritage Site Steering Group (WHSSG) which states that there:

- is likely to be adverse impacts on the processes that maintain the Outstanding Universal Value of the Site;
- will be a significant adverse impact in the manner in which the Site is presented;
- would be a significant adverse impact on the setting in the context of the cultural and sensory experience of the Site.

3.3 THE HISTORIC AND CULTURAL HERITAGE OF DURLSTON CASTLE AND LANDSCAPE

3.3.1 Dorset County Council feels that the Developer's assessment of impacts on Durlston Castle and its environs fails fully to grasp the essential concept that this is more than a series of coastal viewpoints, but is a unique visionary historic environmental asset. It enjoys that status of being a Grade II Registered Park and Garden.

3.4 EFFECTS ON DESIGNATED WILDLIFE SITES AND OTHER HABITATS

3.4.1 The County Council is concerned that onshore cable-laying and substation construction works would lead to losses of habitats within the Dorset Heaths SAC, Dorset Heathlands SPA and Ramsar; to possible indirect effects on these designations elsewhere; to habitat losses in other areas notified within SSSI; and to a wide range of non-designated habitats.

3.4.2 The ES provides insufficient information for the competent authority to be able to undertake a Habitats Regulations Assessment, so it is not currently possible to rule out that there would not be an adverse effect on the integrity of one or more of the European sites.

3.4.3 The County Council has concerns over the appropriateness of mitigation / compensation offered for effects on land designated as SSSI.

3.4.4 The Council also considers that the ES has not demonstrated 'no net loss' of biodiversity and wishes to work with Natural England and NBDL to agree an appropriate level of compensation for residual habitat losses associated with cable laying.

¹ http://jurassiccoast.org/downloads/Navitus/ref7299_UK_Dorset_IUCN_comments_NavitusBay_2014_05_02.pdf

3.5 TOURISM AND OTHER SOCIO ECONOMIC IMPACTS

3.5.1 Dorset County Council is very concerned regarding the adverse impact upon Dorset's tourism sector, particularly in Purbeck, and the inadequacy of the visual representations used to assess that impact. The potential for job creation and economic growth from the Navitus Bay Wind Park is noted, and could support the Council's corporate priority to deliver economic growth and jobs, if not outweighed by the negative impact on the tourism industry. However, significant uncertainty remains regarding supply chain analysis which makes forecasting potential benefits difficult.

3.6 HIGHWAYS CONSIDERATIONS

3.6.1 The Dorset County Highway Authority is satisfied that potential short term impacts of the proposal can be mitigated satisfactorily and that the highway network has sufficient capacity to accommodate proposed construction traffic. In the long term and upon completion of the Project, should it be allowed, the highway impact is considered to be negligible.

4. POLICY CONTEXT

4.1 PLANNING MATTERS

- 4.1.1 The National Policy Statements require consideration to be given to development planning policies of local authorities where these policies are likely to be in conflict with or affected by a major proposal.
- 4.1.2 The Navitus Bay Wind Park would comprise elements of both onshore and offshore development. Within Dorset, the two authorities of Christchurch and East Dorset are directly affected by onshore development, as the proposed cable route will pass through their areas and, in the case of East Dorset, a new onshore substation is proposed. Local authorities within the Dorset County area with port facilities and associated policies – primarily at Portland and at Weymouth – will also be affected. All authorities are likely to see some increase in road traffic, particularly during the construction phase.
- 4.1.3 Regarding offshore development, the coastline and coastal settlements of several council areas in Dorset – Christchurch, Purbeck, West Dorset, and Weymouth and Portland - will be affected by the visual impact of Navitus Bay to a greater or lesser degree and consideration must be given to the relevant landscape policies of these authorities.
- 4.1.4 Each of the above local authorities will provide information on their local planning context and this will not be repeated here.
- 4.1.5 In addition to development plans of individual councils, several cross-boundary plans and strategies might be considered, as follows.

4.2 STATUS OF THE DORSET AND EAST DEVON WORLD HERITAGE SITE

International policy

- 4.2.1 The highest level policy context for the World Heritage Site is provided by the World Heritage Convention and its Operational Guidelines². The Convention places on the UK Government a duty “*of ensuring the identification, protection, conservation, presentation and transmission to future generations of the cultural and natural heritage*” of the Site. Regarding the setting of the Site, the Operational Guidelines seek protection of the immediate setting of each World Heritage Site, of important views and of other areas that are functionally important as a support to the site and its protection.

² UNESCO, Operational Guidelines for the Implementation of the World Heritage Convention, WHC 13/01, July 2013

National policy

4.2.3 The National Planning Policy Framework (NPPF) requires that:

- Heritage assets are conserved in a manner appropriate to their significance.
- In areas defined as Heritage Coast the character of the undeveloped coast is maintained, protecting and enhancing its distinctive landscapes.
- When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.

4.2.4 The NPPF is supported by the National Planning Practice Guidance (NPPG) which refers to heritage assets and designated heritage assets, the latter of which include World Heritage Sites. This includes the following:

When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II listed buildings, grade I and II* registered parks and gardens, and **World Heritage Sites** [our emphasis], should be wholly exceptional (para 132).*

Local policy - The World Heritage Site Management Plan

4.2.5 Local interpretation of the above higher level context is given by The Dorset and East Devon World Heritage Site Management Plan, 2014-2019³. Policies provide for the protection of the landscape, natural beauty and cultural heritage of the Site and setting from inappropriate development. The key clauses are to protect:

- the OUV of the Site through prevention of developments that might impede natural processes, or obscure the exposed geology, as set out in the GCR / SSSI details, now and in the future

³ The Dorset and East Devon Coast World Heritage Site Partnership Steering Group, Management Plan 2014-2019, adopted 13 March 2014

- the landscape character, natural beauty and cultural heritage of the Site and setting from inappropriate development
- the OUV and seaward setting of the Site from adverse impacts of offshore oil or gas exploration and exploitation, or renewable energy developments, particularly regarding the infrastructure needed to bring oil, gas or power onshore

4.3 THE DORSET AREA OF OUTSTANDING NATURAL BEAUTY

- 4.3.1 The Dorset AONB was designated in 1959. It is the fifth largest AONB in the country and covers 1,129 square kilometres, approximately 42% of the area of Dorset. About 80% of the World Heritage Site is within the AONB.
- 4.3.2 There is considerable overlap between the Dorset AONB and Purbeck Heritage Coast, which was defined in 1974. Although Heritage Coasts are not a statutory designation, the Purbeck Heritage Coast is a highly valued component of the Dorset AONB. The international significance and exceptional importance of the Purbeck Heritage Coast was recognised through the award of the Council of Europe's Diploma for the Conservation of Protected Landscapes in 1984, an award that has been renewed as recently as 2009. The Purbeck Heritage Coast is one of only three areas within England currently holding the Diploma.
- 4.3.3 The Countryside and Rights of Way Act 2000 confirmed the significance of AONBs and created improved arrangements for their management. The Act place a statutory duty on all 'relevant authorities' to have regard to the purpose of conserving and enhancing natural beauty when discharging any function affecting land in AONBs.
- 4.3.4 In June 2000 the Government confirmed that the importance and protection of AONBs are equivalent to those of National Parks.
- 4.3.5 The Dorset AONB has a suite of special qualities that make it a unique and outstanding place, underpinning its designation as a nationally important protected landscape. These are the special qualities we need to conserve and enhance for the future and they should be considered in all decisions affecting the AONB. Based on the Countryside Commission's 1993 Assessment of the Dorset AONB, the AONB Management Plan's Statement of Significance, identifies these special qualities as:

Special quality	Comprising
Contrast and diversity – a microcosm of England's finest landscapes	<ul style="list-style-type: none"> • A collection of fine landscapes • Striking sequences of beautiful countryside that are unique in Britain • Uninterrupted panoramic views to appreciate the complex pattern and textures of the surrounding landscapes • Numerous individual landmarks

Special quality	Comprising
	<ul style="list-style-type: none"> • Tranquillity and remoteness • Dark night skies • Undeveloped rural character
Wildlife of national and international significance	
A living textbook and historical record of rural England	<ul style="list-style-type: none"> • An exceptional undeveloped coastline • A rich historic and built heritage
A rich legacy of cultural associations	

4.3.6 The AONB boasts an unrivalled expression of the interaction of geology, human influence and natural processes in the landscape. In particular, it has an exceptional undeveloped coastline, renowned for its spectacular scenery, geological interest and unique coastal features. With relatively little large scale development thus far, the Dorset AONB retains a strong sense of continuity with the past, supporting a rich historic and built heritage. This is expressed throughout the landscape, as generations have successively and sympathetically shaped the area. The landscape has inspired poets, authors, scientists and artists, many of whom have left a rich legacy of cultural associations.

The Management Plan

4.3.7 The Dorset AONB Partnership has an approved and adopted Management Plan for the period 2014-2019⁴, setting out a framework for the conservation and enhancement of the AONB. Objectives and policies relevant to this application include:

Objective	Policy
Objective L1: Conserve and enhance the AONB and the character and quality of its distinctive landscapes and associated features:	<ul style="list-style-type: none"> • L1a: Conserve and enhance landscape character and quality and promote the use of landscape and seascape character assessment to shape decisions affecting the AONB • L1c: Conserve and enhance the special qualities of the AONB such as tranquillity and remoteness, wildness and dark skies
Objective L2: Conserve and enhance the AONB by removing, avoiding and reducing intrusive and degrading features:	<ul style="list-style-type: none"> • L2b: Reduce noise and light pollution • L2c: Remove, avoid and reduce intrusive and degrading features to restore and

⁴ Dorset AONB Partnership, Dorset Area of Outstanding Beauty Management Plan, 2014-2019, March 2014

Objective	Policy
	enhance landscape character and quality
Objective L3: Plan and manage for future landscapes that are resilient and can positively adapt to change:	<ul style="list-style-type: none"> • L3a: Use understanding of landscape and seascape character to assess landscape sensitivity and plan for positive change
Objective CS1: Conserve and enhance the coast and marine environment of the AONB through integrated management that recognises the links between land and sea:	<ul style="list-style-type: none"> • CS1a: Develop greater integration between marine and terrestrial planning and ensure consideration of the AONB, World Heritage Site and Heritage Coasts in both
Objective CS3: Maintain and enhance the open and undeveloped nature of the AONB's coastal landscapes and seascapes:	<ul style="list-style-type: none"> • CS3a: Conserve and enhance the coastal and marine landscape/seascape and improve our understanding of it • CS3b: Conserve tranquil areas along the coast • CS3c: Conserve the undeveloped nature of the coast
Objective PH1: Support sustainable development that conserves and enhances the special qualities of the AONB:	<ul style="list-style-type: none"> • PH1a: Ensure that any necessary development affecting the AONB is sensitively sited and designed and conserves and enhances local character • PH1b: Ensure that proposals affecting the AONB are assessed to a high standard • PH1g: Conserve and enhance the AONB's undeveloped rural character, panoramic views, tranquility, remoteness and wildness • PH1k: Support renewable energy production where compatible with the objectives of AONB designation
Objective PH2: Impacts of development and land use damaging to the AONB's special qualities are avoided and reduced:	<ul style="list-style-type: none"> • PH2a: Protect the AONB from inappropriate development and land use • PH2b: Protect the quality of uninterrupted panoramic views into, within and out of the AONB

4.4 DORSET ECONOMIC STRATEGIES⁵

Transforming Dorset: The Strategic Economic Plan (SEP)

- 4.4.1 'Transforming Dorset' is the Dorset Local Enterprise Partnership's Strategic Economic Plan (SEP) for the period 2014/15 to 2021⁶. It encapsulates the core themes of Talented Dorset, Competitive Dorset, Connected Dorset and Responsive Dorset.
- 4.4.2 The SEP identifies prospects for potential growth in the energy goods and services sector which currently employs around 3,500 people and contributes £173m to Dorset's economy. Dorset has key businesses working directly in renewable energy and offers an ideal environment for renewable energy companies to thrive. The possibility of offshore wind energy being developed through the Navitus Bay windpark is noted by the SEP.
- 4.4.3 The Port of Poole and Portland Port, with ready access to deep water, could assist in putting Dorset at the forefront of construction and support of any agreed wind park developments. Portland Port, in particular, has the potential to become a hub port to support the offshore wind and marine renewables industry. However the SEP acknowledges as a challenge that offshore wind farm supply chain opportunities are poorly identified or developed.

European Structural and investment Funds Strategy (ESIF)

- 4.4.4 The Dorset Local Enterprise Partnership's ESIF Strategy⁷ complements the vision for economic growth presented in the SEP. Recognition is given to the potential for offshore wind energy being developed with the Navitus Bay wind farm and for the opportunities at the Port of Poole and Portland Port which can only assist in putting Dorset at the forefront of construction and support of marine renewables.
- 4.4.5 On a cautionary note, the ESIF's analysis of potential dangers, recognises offshore renewables and in particularly the implications for the tourism sector from wind park developments as a threat to economic growth.

⁵The Environmental Statement accompanying the submission refers to two Dorset economic strategies which are 'Raising the Game', which has long since been superseded, and the DLEP 2011 Prospectus. The Council recommends that the SEP and ESIF strategy replaces the above documents within the local evidence on the Navitus Bay Wind Park.

⁶ Dorset Local Enterprise Partnership, 'Transforming Dorset' Strategic Economic Plan, March 2014

⁷ Dorset Local Enterprise Partnership, Dorset European Structural and Investment Fund Strategy 2012-2020, May 2014

4.5 OTHER RELEVANT STRATEGIES AND POLICIES

Dorset Coast Strategy 2011 - 2021

- 4.5.1 The Coast Strategy⁸ strives to ensure that development of the coast and its inshore waters is sustainable and appropriate for the proposed location; and supports the use of Marine Planning to locate offshore marine industry in appropriate locations.

Dorset Sustainable Community Strategy

- 4.5.2 Dorset's community strategy, *Shaping Our Future (2010-20)*⁹, continues to provide relevant policy context.
- 4.5.3 Economic priorities seek to strengthen the local economy with a focus on businesses and enterprises that build on knowledge and technologies linked to Dorset's environment (the Green Knowledge Economy). These businesses have local, national and global markets and include renewable energy technology, climate change and environmental protection.
- 4.5.4 Environmental priorities recognise the challenge of global climate change to Dorset's environment and our way of life. There is a likelihood of increased coastal erosion, flooding, reduced water supply, changing landscapes and changes to the economy that will affect health, buildings, communications, transportation, biodiversity and businesses. The vision is one of further improving our understanding, protection, conservation and enhancement of Dorset's coast, countryside, marine and historic environments. It envisages an economy based on environmental knowledge and skills develops in Dorset (the Green Knowledge Economy), including renewable energy. It is recognised that emissions causing climate change will need to reduce significantly as the County finds ways to adapt and moves towards a low carbon economy which is less dependent on oil.
- 4.5.5 In summary, the Sustainable Community Strategy gives a high priority to tackling climate change, and supports deployment of appropriate renewable energy technology for economic as well as environmental reasons, whilst seeking to ensure that Dorset's wider environmental assets are protected and enhanced in the process.

Bournemouth, Dorset and Poole Renewable Energy Strategy

- 4.5.6 The Bournemouth, Dorset and Poole Renewable Energy Strategy¹⁰ proposes that 7.5% of renewable energy in Bournemouth, Dorset and Poole could be met by 2020 from new local on-shore renewable energy installations (from a 0.95% baseline in January 2011, which has increased up to 2.1% by January 2014). The remaining 7.5% would be met from renewable energy developed at the "national" level, based on

⁸ Dorset Coast Forum, The Dorset Coast Strategy 2011-2021

⁹ Dorset Strategic Partnership, Dorset Sustainable Community Strategy, Shaping our Future, 2010-2020, November 2010

¹⁰ The Dorset Energy Group, Bournemouth, Dorset and Poole Renewable Energy Strategy to 2020, January 2013

the indicative technology mix in the DECC Renewable Energy Roadmap to 2020, published in July 2011 and updated in November 2013.

- 4.5.7 The proposed Navitus Bay wind park is grouped with all other offshore wind energy projects as part of the assumed “national” 7.5% contribution and is not seen as being part of the local aspirational renewable energy target for Bournemouth, Dorset and Poole.

Dorset Biodiversity Strategy

- 4.5.8 The Strategy¹¹ includes an Action Plan on marine and coastal issues and identifies a number of marine habitats which could be impacted by the proposed wind farm development. Natural England is identified as the lead agency on these issues.

¹¹ Dorset Biodiversity Partnership, Dorset Biodiversity Strategy, Mid-term Review, March 2010

5. MAJOR ISSUES AND IMPACTS

5.1 SEASCAPE AND LANDSCAPE VISUAL IMPACT ASSESSMENT (SLVIA)

Assessment of impact

- 5.1.1 While the County Council recognises in general the approach to SLVIA adopted by NBDL, a contentious aspect of the methodology relates to the thresholds of significance that are applied. The Developer only treats impacts which are *greater than* Moderate (i.e. Major or Major/Moderate) as Significant. This is a departure from the norm. In common with many other Environmental Statements, the effects *comprising* Moderate and above should be considered Significant for this SLVIA.
- 5.1.2 The Council considers that there has been an underestimation by the Developer of both the susceptibility and value of landscape assets in some affected areas, such as the Dorset AONB. Furthermore, the magnitude of change predicted to affect landscape and visual receptors appears to be appreciably lower than we would anticipate when considering the worst case scenario for a development of this scale and extent.

Susceptibility

- 5.1.3 The County Council disputes the susceptibility assessment of the Purbeck Coast, Swanage Bay, Bournemouth Bay and Christchurch Bay Regional Seascape Units and the Sandy Beaches, Slumped Cliff and Hard Rock Cliffs Coastal Seascape Types. It is unclear how the SLVIA has concluded that because the views from these are to varying degrees open/expansive/elevated/large scale and/or panoramic in nature, that this reduces their susceptibility to the type of development being proposed. The Council's view is that the converse would be the case and that this would increase these areas susceptibility to development. If openness is a key characteristic in these areas, the introduction of built elements would clearly compromise this.

Magnitude

- 5.1.4 The Council maintains that the magnitude of the impact on the Purbeck Coast, Swanage Bay, Bournemouth Bay and Christchurch Bay units is underplayed by the Developer. Where it is stated, for instance, that in the Swanage Bay unit, '*views from the headlands/cliff are open and expansive*' and will be able to '*accommodate the development due to their large scale and expansive horizon line*', the County Council considers there is a need for further explanation of this statement and how it relates to the scale of effect assessed and to the subsequent significance judgement.

Scale of effect and significance

- 5.1.5 In the Bournemouth Bay and Christchurch Bay units, the SLVIA recognises that the development will create either a new focal point in an open seascape or that the entire wind park will be visible and occupy most views offshore /a high/relatively high proportion of the views.
- 5.1.6 Given this acceptance by the Developer, the County Council considers that the scale of effect and therefore significance has been underplayed by the assessment. The scales of effect at Viewpoint 15 Sandbanks Beach, 17 Branksome Dene Chine and 18 West Cliff Beach are all felt to be underplayed bearing in mind the 'conspicuous' or 'obvious' appearance of the project or it 'introducing a new focal point'.
- 5.1.7 The SLVIA goes on to conclude that in the Slumped Cliffs Coastal Seascape Types, *'despite the clear views of the project, the open nature of the cliffs, often with expansive sea views, will allow the project to be accommodated'*. Similarly, while recognising that in the Hard Rock Cliffs Coastal Seascape Type the project will create a new focal point, the Developer concludes that the elevated nature and large scale of these views will *'allow the project to be accommodated, decreasing the scale of effect'*.
- 5.1.8 The Council considers that the Coastal Waters, Active Coastal Waters and Inshore Waters Maritime Seascape Character Units assessment of significance has been underplayed.
- 5.1.9 The County Council's assessment of impacts is summarised in tabular form as Appendix A. This appendix table should be read in conjunction with the following Figures in the Environmental Statement, Chapter 13 – Seascape, Landscape and Visual (Document 6.1.2.13); and in the separate document 'A1 Figures and Visualisations'. Reference to these Figures may also be made when reading this section of the LIR.
- Fig 13.4 Regional Seascape Units
 - Fig 13.5 Seascape Character Types
 - Fig 13.7a County Landscape Character: Dorset
 - Fig 13.9 Viewpoints and Landform
 - Fig 13.15 Zone of Theoretical Visibility 8 MW Layout Bareground (West)

The Dorset AONB

- 5.1.10 The Council notes that SLVIA identifies significant effects, affecting a substantial area and highly valued area of the Purbeck coast, entirely within Dorset AONB. The Council considers that there will also be wider significant effects on character and views, including Studland Beach, views from recognised and promoted viewpoints on Brownsea Island, views from the Purbeck Hills and the experience of coastal character from locations to the west of St. Aldhelm's Head, extending to Worbarrow Tout.

- 5.1.11 The AONB's Management Plan¹² supports renewable energy developments of appropriate scale and location. However, the proposed wind farm's scale and location are not appropriate and the foreseeable seascape, landscape and visual effects produced by the offshore turbines would adversely affect the setting of the AONB and weaken qualities that make the AONB a nationally treasured place.
- 5.1.12 The Council's asserts that the impact assessment for the overall AONB has been under-assessed by the SLVIA. Consequently the SLVIA's overall assessment of effect on the AONB is contested. The assessment concludes that the overall effect on the AONB will be 'not significant' in EIA terms and that "the purpose of the AONB designation, 'to conserve and enhance natural beauty' would not be affected to the extent that the integrity of the AONB would be harmed".
- 5.1.13 The Developer maintains that the aims and objectives of the designation would not be compromised by the development, as the nature of the effect is limited to a 'perceptual' one which would not alter the inherent physical properties and attributes of the AONB. The County Council disputes this view. It considers that judgements regarding significance should take into consideration the importance of the affected area in expressing Special Qualities that are of defining importance to the AONB designation. It is self-evident that any foreseeable harm produced by the development would weaken the AONB, given the exceptionally high sensitivity of the Purbeck coast and its extremely strong expression of the AONB's Special Qualities. Considering the foreseeable effects on prized assets, the development would weaken the AONB to an unacceptable degree.
- 5.1.14 The EIA regulations require that the ES should describe mitigation measures to avoid, reduce and where possible offset or remedy any identified significant adverse effects. True, iterative primary mitigation measures have been built into the design at various stages. However secondary measures, designed to address the identified residual effects, are still not mentioned. The ES does recognise that these are significant under EIA regulations but simply states that impacts cannot be mitigated further than already proposed despite recognition that some significant visual effects have been identified and that effects on receptors, such as the Dorset AONB, have not been materially reduced through primary mitigation incorporated thus far.

World Heritage Site

- 5.1.15 The Council agrees with the SLVIA's sensitivity assessment of High for the designated areas of the two AONB's in Dorset and for the World Heritage Site. However, there is no mention of the importance of the setting of the WHS and this is not assessed in this chapter despite visual aspects being critical to setting.

Photomontage visualisation

- 5.1.16 The County Council's main contention with the SLVIA lies in the belief that there has

¹² Dorset AONB Partnership, Dorset Area of Outstanding Beauty Management Plan, 2014-2019, March 2014

been an underestimation by the Developer of both the susceptibility and value of landscape assets. However, there is an additional concern which relates to what the Council sees as the misrepresentation of the proposal by the Developer to the Council and the general public.

5.1.17 The photomontages provided within the SLVIA conform to the 2006 Scottish Natural Heritage (SNH) guidance on the visual representation of wind farms. It should be noted that the 2006 SNH guidance¹³ does not specifically apply to offshore wind farms. Furthermore the guidance has been subject to review, including the advised 50mm projected focal length, which is frequently observed to under-represent turbine scale. In July 2014 SNH published revised guidelines¹⁴ in which a 75mm projected focal length is advised for both onshore and offshore wind farm photomontages. There is concern that the montages provided do not represent the worst case scenario and therefore fail to provide a realistic indication of what the wind park may look like if built in the proposed location. This matter will be argued more fully by others, Challenge Navitus in particular. The Council's view is that the Challenge Navitus work is arguably a more useful representation of the most prominent anticipated effects of the development.

5.1.18 Research commissioned by Dorset County Council¹⁵ demonstrates that visual impact will be reduced by locating the wind park further off shore to the south. NBDL had previously maintained that this would not be possible because Chalk further off shore is 'too soft' for foundations that penetrate the sea bed. However the County Council now understands that consideration may be given to placing a proportion of the turbines on Chalk using space frame foundations.

5.1.19 The Council believes that Chalk is not a constraint to placing the wind farm further offshore to reduce its visual impact.

5.2 IMPACT ON WORLD HERITAGE STATUS FOR THE JURASSIC COAST

5.2.1 In assessing potential impacts of the proposed offshore wind park on the World Heritage Site, Dorset County Council endorses and supports the position of the Jurassic Coast Steering Group (JCSG). The Group is a non-executive committee made up of organisations that have a key role to play in the delivery of the aims and policies of its Management Plan, as well as individuals with relevant expertise. The Group is led by Dorset and Devon County Councils as the two main accountable authorities who were responsible for initially securing the designation of the Site.

5.2.2 The JCSG has made available to the Examining Authority relevant representation on potential impacts to the World Heritage Site. Dorset County Council aligns itself with this position statement. The key points relate to the Outstanding Universal Value (OUV) of the Site; the manner in which the site is Presented; and its Setting.

¹³ Scottish Natural Heritage, Visual representation of windfarms. Good practice guidance, March 2006

¹⁴ Scottish Natural Heritage, Visual representation of windfarms, Version 2, July 2014.

¹⁵ Land Use Consultants (LUC), Navitus Bay Offshore Windpark: Review of Visualisation Methodology and Preliminary Environmental Information: Seascape Landscape and Visual Impact Assessment, November 2013

Outstanding Universal Value and Attributes

- 5.2.3 The Statement of Outstanding Universal Value (SOUV)¹⁶ sets out the special qualities of the Site, in relation to UNESCO criteria and Integrity. It also identifies the Management arrangements, which UNESCO consider of paramount importance. This SOUV was agreed by UNESCO in 2012. The Statement is shown in full in the JCSG submission.
- 5.2.4 The Site also has prescribed Attributes or features, which are aspects of the coast and which are associated with or express its Outstanding Universal Value. These may be tangible or intangible. Full details of Attributes for the Dorset and East Devon WHS are found in the JCSG submission, but comprise: a near-continuous sequence of Triassic, Jurassic and Cretaceous rock exposures; a diverse range of internationally important Mesozoic fossil localities, including key areas for Triassic reptiles, and for Jurassic and Cretaceous mammals, reptiles, fish and insects; significant geomorphological features; a key role in ongoing scientific investigation and educational use, and in the history of science; and an understanding of the underlying geomorphological processes in the setting of the Site.
- 5.2.5 The potential impact on OUV or Attributes would come from the wind park structures changing the natural behaviour of the wave pattern, strength and direction. This could change the natural rate and behaviour of erosion of the soft cliffs along the World Heritage Site between Studland Bay and North Swanage, and between Peveril Point and Ringstead. The designation is based on this being a dynamic natural coastline and it is this potential impact on natural processes that is under scrutiny here.
- 5.2.6 The central question is whether the presence of the wind farm will significantly reduce the wave heights on this section of the coast, and in so doing will leave the cliffs less active and the rocks less well exposed. Waves from the south, south-east and east are expected to be reduced by between 2.5 to 5.0%. There is a slightly higher reduction of wave height (up to about 6%) for the peak waves from the south-east. Under these normal sea conditions, these reductions are unlikely to significantly alter the present process regime. In fact, the changes in sea level predicted for this area although small will partially negate this.
- 5.2.7 The Steering Group considers therefore that although it is likely that the development will have an impact on the natural processes that drive the WHS and are integral to its OUV and Attributes, the extent and magnitude of this impact under normal conditions will probably be so low as to be insignificant.
- 5.2.8 However, the Group does express its serious concern that there is a lack of information provided about 'high magnitude low frequency events'. Given the statement in 6.7 of its Position Paper to DCMS (23rd December 2013 and revised 15th May 2014)¹⁷, it is unlikely that this will have a significant impact, but given the lack of information available they are unable to say that with certainty.

¹⁶ http://jurassiccoast.org/downloads/Navitus/Annex_3_Jurassic_Coast_SOUV_and_Attributes.pdf

¹⁷ <http://jurassiccoast.org/navitus>

- 5.2.9 The International Union for the Conservation of Nature (IUCN), which is UNESCO's technical advisory body in respect of natural World Heritage Sites, concludes that: *the Project is likely to have some adverse impacts on the underlying geomorphological processes in the setting of the property that are essential for the long-term maintenance of its OUV, although further data, information and analysis are required in that regard*¹⁸.
- 5.2.10 NBDL has analysed impact on each of the five attributes of OUV, and on the impact on protection and management. Their conclusion is that the impact of the project on all of these to be Not Significant. Elsewhere, NBDL acknowledges that there would be *some* decrease in wave height and period, and therefore some impact on designated coastal areas, which would potentially have some impact on all of the attributes of the Site.
- 5.2.11 Whilst there is some common ground between the Steering Group and the Developer that the potential adverse impact on OUV under normal sea conditions is not likely to be significant, the issue of any change to the erosional behaviour of 'high magnitude low frequency events' is not resolved. IUCN's view also raises a question about the threshold for significant impact as NBDL do not state this, merely pointing out that there is likely to be an adverse impact.
- 5.2.12 This matter can only be resolved if NBDL undertakes the necessary studies to determine likely changes to the erosional behaviour of high magnitude low frequency events, such as those experienced over the winter of 2013/14.

The Presentation

- 5.2.13 The WHS Steering Group considers that the Presentation of the Site comprises both:
- (a) **The giving or presenting of information** about the WHS, including all forms of interpretation and educational material, activities and actions; and
 - (b) **The manner in which the WHS is given or presented** to visitors, meaning its visual (and possibly aural) envelope, and the condition of that envelope in the context of the natural properties of the Site.
- 5.2.14 Regarding the first of these, it is felt that the wind farm will have no impact on the ability to give information about the WHS, other than no longer being able to take photographs of parts of the coast with uninterrupted views.
- 5.2.15 However, regarding the second element, the manner in which the Site is presented, the Steering Group's judgement is that there will be an adverse impact on the manner in which the Site is presented. This adverse impact would be the result of the introduction of man-made structures into a setting that is perceived by most to

¹⁸ http://jurassiccoast.org/downloads/Navitus/ref7299_UK_Dorset_IUCN_comments_NavitusBay_2014_05_02.pdf

be natural; so the structures are not in keeping with the natural visual envelope surrounding the Site.

5.2.16 Furthermore, the Steering Group concludes that in magnitude terms the visual impact on the section of the WHS between Old Harry Rocks and St Aldhelm's Head (the section that includes Durlston Head) is **Significant** under EIA regulations. This is the only potential proxy for analysis of the impact of the introduction of man-made structures into a natural view, so may be used for this purpose.

5.2.17 NBDL assertion that the project would not affect the OUV fails to take into account any analysis of the wider "*presentation and transmission*" to future generations as set out in Article 4 of the World Heritage Convention¹⁹ to which the Steering Group refers.

5.2.18 IUCN's conclusion is that:

Any potential impacts from the Project on this natural property are in contradiction to the overarching principle of the World Heritage Convention as stipulated in its Article 4, as the completion of the Project would result in the property being presented and transmitted to future generations in a form that is significantly different from what was there at the time of inscription and until today. Specifically, the property will change from being located in a natural setting that is largely free from man-made structures to one where its setting is dominated by man-made structure (letter from UNESCO to DCMS, 2nd May 2014)²⁰

The Setting

5.2.19 The Setting of the WHS is the surrounding landscape and seascape, and comprises the quality of the cultural and sensory experience surrounding the exposed coasts and beaches. The Steering Group and the County Council are in no doubt that the proposed development would be *within the setting* of the WHS. Protection for the WHS setting can only be applied in relation to the asset itself, or through some other measure that affords protection. The AONB provides this protection for the Setting.

5.2.20 The Coast was not inscribed on the World Heritage list for its natural beauty but UNESCO recognised its value as 'nationally important' on this criterion, confirmed by the UK Government's designation of the East Devon and Dorset Areas of Outstanding Natural Beauty which cover more than 80% of the WHS area. The assessment of landscape and seascape character comes through the work of the AONB management partnerships and Dorset and Devon County Councils, and provides a starting point for evaluation of the impact of change in the setting.

5.2.21 Details of how the AONB is seen as protection for the setting of the Site in lieu of a buffer zone are explained in the Steering Group's submission. The relevant special qualities and landscape and seascape character of the Dorset AONB act as the proxy indicator for the condition of the setting. Thus the Steering Group and County

¹⁹ UNESCO, Operational Guidelines for the Implementation of the World Heritage Convention, WHC 13/01, July 2013

²⁰ http://jurassiccoast.org/downloads/Navitus/ref7299_UK_Dorset_IUCN_comments_NavitusBay_2014_05_02.pdf

Council's view is that anything which impacts on the AONB can also be seen as impacting on the setting of the WHS, depending on its location, details and nature.

- 5.2.22 The Setting may also be seen in terms of its cultural and sensory experience, both in relation specifically to the OUV and attributes of the Site, and also in terms of the wider understanding.
- 5.2.23 The Developer has acknowledged that elements of setting are important for conveying the OUV of the Site. These comprise such as the surrounding geological environment of the East Devon and the Dorset coastlines that place the OUV in a wider landscape context; the relationship with the sea, which plays a central role in the on-going erosion of the geological exposures; and views along the Jurassic Coast WHS that allow for an appreciation of geological progression of the visible exposures, and views from the foreshore towards the geological exposures, allowing an intimate experience of the OUV. The Steering Group does not dispute the validity of these in the context in which NDBL have set them.
- 5.2.24 However, a further wider cultural and sensory experience of the setting of the Jurassic Coast must also be taken into consideration. Visualisations provided by NBDL and Challenge Navitus confirm that the Wind Farm will be highly visible on a clear day, particularly from Durlston Head. The experience in this context would relate to the visitor expectation and perception of a largely undeveloped natural landscape; their reading of the landscape in terms of the links between the sea and erosion; and their understanding of the links between Old Harry Rocks and the Isle of Wight Needles. The issue of tranquillity, sense of place and wellbeing may also need to be taken into account.

5.3 THE HISTORIC AND CULTURAL HERITAGE OF DURLSTON CASTLE AND LANDSCAPE

Visionary historic and environmental asset

- 5.3.1 The Developer's assessment of impacts on Durlston Castle and its environs fails fully to grasp the concept that this is a unique visionary historic environmental asset and much more than a series of coastal view-points.
- 5.3.2 George Burt built Durlston in the late nineteenth century as a site which had an educational and cultural infrastructure to teach and inspire people about the natural wonders of the coastline, the sea and the heavens, linking this with quotations from some of our greatest poets and thinkers. His core idea is inscribed on a huge rock which states "Look around and read great nature's open book". The facts set before people the choice of the wild and natural site, and the way in which planting was used to attempt to enhance the value of the site indicates that its natural and unspoiled qualities were part of his inspiration, especially the contribution of the curving horizon of the Channel waters. This inspirational vision is incorporated into the new elements and restored Castle buildings and the refurbishment of the park, and in the new artworks that have been installed to complement and update that vision, creating a gateway to the Jurassic Coast Dorset and East Devon World Heritage Site.

Dark skies

- 5.3.3 The Developer states that at night the Turbine Area would present insignificant harm to the appreciation of the extensive night-time seascape. The Council considers that insufficient evidence has been provided to substantiate this assertion. It is also concerned that the development may affect Durlston's official recognition as a Dark Sky area with the very highest Dark Sky Discovery Site classification, described as 'Milky Way Plus'. This classification means that the sky is so free of light pollution that the dimmest of stars are visible to the naked eye.
- 5.3.4 Night time seascapes are seen under moonlight, under starlit moonless nights and, on cloudy nights, from the cloud base. Night time provides some of the most surprising and evocative seascapes. When it is not influenced by modern light the eye adapts to these low light levels and can see reasonably well. These dark landscapes are formally visited when the Park Rangers lead night time nature walks in search of bats and glow worms both of which live in the Park. This point also applies to all the other monuments at which invisibility of the seascape at night is invoked as a factor to diminish the significance of the intrusion.
- 5.3.5 The Developer maintains that the lighting of the operational site would be minimal and unobtrusive but the County Council would wish the Panel to satisfy themselves that this will in fact be the case. It is also unclear what forms and level of lighting will need to be in place during the construction phase.

Seascape

- 5.3.6 NDBL suggests that the Turbine Area would feature as a distant, visually permeable element of the extensive sea views that are possible from the south and east elevations of Durlston Castle, from the vicinity of the Globe and from the Tilly Whim Road coastal path along the southern boundary of the Park. It is maintained by the Developer that from these vantage points the seascape vista is extensive and the Turbine Area would only alter part of the observable maritime horizon. Furthermore, the Developer suggests that the Turbine Area would not prevent an appreciation of the extensive vista, and would have no impact upon the observer's comprehension of the scale of the seascape.
- 5.3.7 The County Council disagrees, particularly taking into account the sympathetic and carefully designed recent restoration of the Castle, which attracted the award of Best Heritage Project in the 2012 National Lottery Awards. The panoramic views created by George Burt have been supplemented in the new sections of the building by architectural handling that enhances the revealed horizon effect. Inside the building, the windows are designed to show vertical vignettes of seascape. When exiting the building, the visitor is immediately exposed to a huge widening of the vista.
- 5.3.8 The design also includes 'over-the-edge' artistic balconies inserted at levels 1 and 2 to draw the visitor's attention out to the horizon. The first reveal along the

circulation through the building comes when emerging from the central keep into the garden area which leads down to the exhibition area at the bottom of the building. Following the path down to the first over-the-edge balcony this subtends only a 90° arc of the sea horizon and the wind farm would be hidden from that view though visible from the path approaching the balcony. The over the edge balcony at level 1 subtends a 180° arc of sea horizon. The café terrace area at level 3 subtends a 90° arc of sea horizon. At the highest level of level 4, at the point on the ramp to the door which peeps round the building towards the west, the viewpoint subtends a 225° arc of sea horizon.

5.3.9 As the wind farm subtends a 60° arc of horizon, so the impact on the sea horizon of the spread of the wind farm is set out below:

Location / reveal	Visual impact on sea horizon
First over the edge balcony on level 2	No impact
Main over the edge balcony on level 1	180° horizon arc / 60° wind farm arc / farm occupies 33% of sea horizon
Café terrace on level 3	90° horizon arc / 60° wind farm arc / farm occupies 66% of sea horizon
Level 4	225° horizon arc / 60° wind farm arc / wind farm occupies 26% of sea horizon
Above the Globe	180° horizon arc / 60° wind farm arc / wind farm occupies 33% of sea horizon

5.3.10 Given that the perceived height of the turbines would be three times the perceived height of the Isle of Wight, this is a significant intrusion onto the sea horizon. That the character of the intrusion is of a man-made nature rather than a natural character or seascape character heightens the impact of this on the setting of Durlston creating a taint on the experience of the site and thus harming the asset.

5.3.11 A further feature of Durlston is the capacity to see the curvature of the Earth in the line of the horizon. This is a feature which is specifically described on one of the inscribed stone tablets mounted on Durlston Castle. If that curvature is broken by masts then the effect is to destroy the wonder of perceiving the Channel's horizon as a curve.

Assessment of impact

5.3.12 NBDL maintains that given the distances involved the Turbine Area would not dominate the seascape vista. Indeed it is suggested that the scale and massing of the turbines is such that they would form a focussed and conspicuous feature within the

seascape and would not distract attention away from an appreciation of the more extensive sea views. This is a subjective and not an objective judgement. For each individual person, the level of distraction the turbines would have in the seascape would be affected by that individual's views on the acceptability of wind turbines.

- 5.3.13 NBDL accepts that sea views from 'The Chart' (a stone carved map of the English Channel) would feature the Turbine Area prominently in what would be key views from the asset. The Developer rightly recognises that The Chart is orientated 'upside-down' to match the readers viewpoint across the Channel and acknowledges that sea views are central to the understanding of The Chart. However, it dismisses this concern by suggesting that views are currently screened by dense vegetation which has been allowed to develop around The Chart. This temporary mismanagement of the site occurred due to changes in personnel as the HLF funded improvement works to the Castle were being completed. The vegetation is currently managed as it should be so that the asset can be properly understood. The impact of the Turbine Area on this feature would be substantial.
- 5.3.14 The Developer believes that the carefully controlled 'reveal' points within the Park are considered to have especially limited tolerance to certain types of change. Such intentional views of the seascape are made visible to the observer at selected locations. The Council's view is that this again is a subjective judgement not an objective one. The purpose of Victorian and Modern landscape design at Durlston is centred on creating the surprise reveals of horizon - as a sudden impact. The screening-off helps to create the surprise and if the surprise is tainted by an intrusion then the impact made by the intrusion is so much more significant.
- 5.3.15 Overall, the Developer believes that the effect magnitude of the wind park on Durlston Grade II Registered Park and Garden is considered to be Imperceptible. As such, the overall likely adverse effect of the development is considered Not Significant. Dorset County Council disagrees and assesses the effect magnitude as Perceptible and that the likely adverse effect would be Significant.

Mitigation

- 5.3.16 The County Council disputes the Developer's assessment that there is no potential effect on the importance of the Durlston Castle and Park. The implication is that the Turbine Area would not prevent an appreciation of the extensive seascape extending across the English Channel, but it would simply alter its character. As such the Developer maintains that this potential alteration to the extensive seascape vista cannot be effectively mitigated. This is unacceptable. As it stands NBDL's conclusion regarding potential mitigation is used only to justify the decision to accept the scheme as it stands. This is not mitigation.

5.4 EFFECTS ON DESIGNATED WILDLIFE SITES AND OTHER HABITATS

Dorset Heaths SAC, Dorset Heathlands SPA and Ramsar

- 5.4.1 The County Council shares Natural England's and NBDL's view that a Habitats Regulations Assessment (HRA) is required.
- 5.4.2 NBDL recognises that the development in the West Moors MOD site would lead to the loss of 1.67ha of habitat within the Dorset Heaths SAC, Dorset Heathlands SPA and Ramsar (ES Doc 5.4, 4.4.3). Natural England's relevant representation suggests the area affected would be higher, at 2.4ha. Under the HRA, loss of or detrimental effects on such sites would be considered a likely significant effect, and before granting consent the competent authority would need to undertake an appropriate assessment of the implications of the development for the European site interests.
- 5.4.3 The information currently submitted by NBDL which could advise the preparation of the HRA concludes that on the basis of the mitigation offered there would be no adverse effect on the integrity of the European sites. A similar conclusion is drawn for the Dorset Heathlands SPA, relying largely on enhanced management for Annex 1 birds of 31.5ha of the Forestry Commission's forested estate. NBDL has not addressed later stages of the HRA process (Regulation 62 et seq.) as they do not intend to rely on arguments regarding imperative reasons of overriding public interest.
- 5.4.4 NBDL is offering to undertake habitat management as mitigation for effects within the designated boundary. The County Council's view is that this cannot be regarded as suitable mitigation as there is a legal requirement to maintain or restore the European sites for their interests, and the wind park development is not required to achieve such management or restoration. Habitat management offered outside of the designations on land owned by the MOD and the Forestry Commission is habitat compensation and cannot be considered within Habitats Regulation 61 in an appropriate assessment of effects on site integrity.
- 5.4.5 If it were concluded, with conditions or restrictions, that an adverse effect on the integrity of a European site could not be ruled out, the competent authority could only grant consent under closely defined circumstances set out in the Habitats Regulations, including considerations of alternatives, imperative reasons of overriding public interest, and maintenance of the overall coherence of the European sites.
- 5.4.6 The County Council supports Natural England's view that further detailed information is required from NBDL to determine the extent of effects within European sites, to enable the competent authority to conclude whether an adverse effect on site integrity could be ruled out, and whether further regulatory considerations would be necessary. For example, without further detail being submitted, horizontal directional drilling or open trenching could lead to an overall loss of naturalness in the designated sites through irreversible changes to local topography and drainage, even if surface habitats appeared unaffected or were

restored to high quality habitat supporting European interest features. There could also be loss of ecological function over years between initial damage and restoration end point. These matters are important considerations in consideration of adverse effects on integrity.

- 5.4.7 There is a further issue concerning the Dorset Heathlands SPA and the management of human recreation and disturbance that might arise during the cable-laying phase. For example, the cable-laying operation will involve temporary closure of two car parks and a significant length of footway in Hurn Forest. It is possible that temporary closure of these popular destinations for regular dog walking would lead to temporary or even permanent displacement for such activity to other places including nearby European sites. The County Council again supports Natural England's view that further detailed information is required from NBDL to determine likely extent of recreational displacement within European sites, to enable the competent authority to conclude whether an adverse effect on site integrity could be ruled out.

Sites of Special Scientific Interest

- 5.4.8 It has been identified that direct loss to development of land would take place within nationally designated sites in parts of St Leonards and St Ives SSSI. Within the SSSI boundary, open trenching techniques are proposed which would result in temporary loss of habitat and displacement of fauna across an area of 1.8ha. The ES proposes mitigation in the form of a combination of habitat restoration and management amounting to 3.18ha of new or enhanced heathland habitat within the SSSI. Natural England has powers to impose on a landowner appropriate management of a SSSI. It is thus inappropriate for NBDL to offer habitat management as mitigation since development is not needed to achieve required management. In addition, the forested land is in public ownership of the Forestry Commission and it is very likely that appropriate management of the SSSI would be achieved in any case as proposed within the Forest Design Plan for the area.

Residual loss of biodiversity below national level

- 5.4.9 NBDL has presented a summary of features and activities included in their impact assessment. A number habitats such as dense and scattered scrub, unimproved acid grassland and coastal grassland, and improved and semi-improved grassland, fall out of further consideration as they are considered to be habitats of the lowest value. Only those habitats considered of local or higher value, mixed deciduous woodland, heathland, rivers and streams, and hedgerows, are then assessed and are listed in several sequential assessment tables. NBDL proposes to establish an offset fund to ensure improvement of the non-statutory site network (Sites of Nature Conservation Interest in Dorset), to be secured through the DCO and made available in Dorset via the Dorset Local Nature Partnership – although there are no details on how this fund would be calculated.
- 5.4.10 NBDL thus identifies a more limited suite of habitats that would be affected in the short to medium term by cable laying than would actually occur if implemented. The

County Council considers that there is inadequate justification for the screening out of certain habitats, and a fuller range of undesignated habitats should be compensated where residual effects remain. The County Council shares Natural England's concern that the ES does not demonstrate 'no net loss' of biodiversity associated with cable laying.

- 5.4.11 The offer of an offset fund is noted. This fund should first be secured by a Development Consent Obligation before the DCO is determined and the County Council would be willing to work with Natural England to provide NBDL with a mechanism for calculating the residual value of the habitats that would be lost. The emerging Dorset Biodiversity Compensation Framework might be used. The Framework is based on DEFRA's own Biodiversity Offsetting metrics, adapted to the local list of habitats present in Dorset. The Framework would be able to take account of a range of habitat losses outside of designated wildlife areas, and could be extended if required to cover losses to designated areas.

5.5 TOURISM AND OTHER SOCIO ECONOMIC IMPACTS

Impact upon the Dorset economy

- 5.5.1 The main issue to be considered concerns the benefits or disbenefits of the proposed wind park in terms of impact upon the local economy. Objective assessment of the proposal is not assisted by the lack of clarity on design, construction, and operational details of the proposed wind park. Whilst economic modelling is always subject to assumptions and uncertainties, with the information available it is just not possible to determine precisely what impact the proposal will have upon local jobs, ports, and specific sectors.
- 5.5.2 The economic impacts cannot be considered in isolation, and the topics covered elsewhere in this report have a significant bearing on this issue. For example, the accuracy and interpretation of the visualisations impact upon the credibility of the visitor surveys and the conclusions drawn from the results. The potential impact upon the World Heritage Site status has implications for the tourism sector and the broader presentation of Dorset as a suitable business location for inward investment. Where there is uncertainty the Council must err on the side of caution and seek to conserve and nurture the local economy and environment, rather than gamble on poorly evidenced scenarios of growth potential.

Broad economic impact

- 5.5.3 The potential for job creation and economic growth from the Navitus Bay Wind Park is noted. However, from the evidence presented it is impossible to say with any certainty that these will outweigh the potential negative impacts, particularly upon the tourism sector.
- 5.5.4 The most obvious potential benefits for the local economy arise from:

- Increased business activity within the supply chain for the construction and maintenance of the wind park,
- New and potentially long-term business activity for Portland Port,
- Creation of new jobs, increasing the diversity of employment opportunities, and,
- Up-skilling of the local workforce.

- 5.5.5 NBDL suggests that the overall spend of the scheme is expected to be £5.4 billion. However, this figure is greatly reduced (£0.9 billion) for the direct UK expenditure, reflecting the limited domestic content in on and offshore wind projects to date, and the need to invest to increase the capacity within the UK.
- 5.5.6 The three scenarios presented by BVG Associates on behalf of NBDL, and generated to forecast varying levels of activity at a local level, are of limited value to local decision makers. The 'local economy' for the scenarios includes Dorset, Hampshire and the Isle of Wight, which is a much wider area that would normally be deemed 'local'. The analysis of impact and benefit should have drilled down to truly local levels in order to demonstrate a better understanding of the interrelationships of this area and how they apply to specific sectors.
- 5.5.7 The three scenarios vary significantly in their forecast outcomes. There is little guidance as to which of these is most likely to occur, and hence planned preparation is difficult. In order to maximise beneficial, local impacts from the proposed wind park local suppliers of goods, services and training need time and parameters around which to invest, secure resources and increase capacity. Without sufficient guidance and lead-in times the opportunity to redress the UK content issue identified above will be limited, thereby reducing the potential for local benefit.
- 5.5.8 It is noted that NBDL has signed a memorandum of understanding with Portland Port, and several other ports in the vicinity. Whilst this dialogue and funding for feasibility work are welcomed, it does not at this stage guarantee business and income for the port and the local economy. Clarification of the role of the ports, particularly Portland Port, in the construction and maintenance of the wind park would be welcomed.
- 5.5.9 The Council recognises the opportunity to train the local workforce to be able to secure employment associated with the proposed wind park, and obtain transferable skills in the process. However, there is concern with the Environmental Statement which only refers to training providers in the urban areas around Bournemouth and Southampton. This suggests a lack of appreciation and/or a lack of commitment to utilise the full range of training facilities and providers in and around Dorset.
- 5.5.10 Should an appropriate training strategy not be forthcoming there is the threat that demand for skilled workers will create shortages in other sectors, or migrating workers will put pressure on local services, particularly with the 'high' scenario.
- 5.5.11 The Council notes that the supply chain analysis anticipates that salaries during the construction and decommissioning stages will be in the region of £40-50,000, which

is significantly above the Dorset average of around £26,000. Further explanation of the derivation of these higher salaries is required to substantiate the developer's case. The Council would also like to see a commitment from the developer in the proposal to promote opportunities for young people, an element of which traditionally have had low aspirations or have opted to leave the area due to the perception of limited, low paid employment opportunities.

Tourism

- 5.5.12 Dorset County Council is very concerned about the potential adverse impact of the proposed wind park upon the tourism sector.
- 5.5.13 The County of Dorset has a strong tourism, leisure and hospitality sector accounting for about eight per cent of economic value or £6,524 million²¹. The sector includes more than 1,200 businesses (VAT/PAYE registered from UK Business dataset, ONS, 2013) accounting for about eight per cent of employment or 11,700 employees (excluding self-employed and using a narrow definition and compared to six per cent nationally from Business Register and Employment Survey dataset, ONS, 2012).
- 5.5.14 Whilst there are particular concerns for the Purbeck area, being geographically closest to the proposed wind park, the interdependence of the 'Dorset offer' to the visitor economy must be appreciated. An adverse impact upon visitor numbers to Bournemouth and Poole will have an adverse impact upon the wider Dorset and New Forest area, particularly in terms of numbers of day visitors, and spend, to attractions and other tourist destinations
- 5.5.15 The 2013 business survey, referred to in the Environmental Statement, found that 28% of businesses thought the implication for them would be either medium or high adverse impact, and a further 12% expected a low adverse impact. The average turnover reduction anticipated by these businesses was some 22%.
- 5.5.16 Applying these percentages to visitor spend suggests a loss of £76 million of visitor spend in the Bournemouth/Poole/Christchurch/Purbeck area (£14 million in Purbeck, £7 million in Christchurch, and £55 million in Bournemouth/Poole).
- 5.5.17 Bournemouth, Poole and Christchurch businesses were more likely to expect visitors to continue to visit the area regardless of the wind park, with 36% anticipating an adverse impact (high, medium and low). However, in Purbeck business expectation of an adverse impact was much higher at 77%, suggesting a spend loss in excess of £24 million. Purbeck businesses therefore have a gloomier outlook on the impact of the proposed wind park on their tourism business. This should not be disregarded lightly as businesses best know their clients and their likely reaction, and in Purbeck the internationally significant coast and landscapes are hugely significant factors to the tourist industry.

²¹ The South West Research Company's estimate of tourism GVA for 2011 as a percentage of ONS total 2011 GVA data for DCC Dorset

- 5.5.18 The visitor surveys undertaken on behalf of Navitus Bay Development Limited found that 20% of summer visitors and 10% of spring visitors said they were likely or very likely to visit somewhere else during the construction phase, with concerns largely linked to potential disruption to beach activity, pollution in the sea and noise.
- 5.5.19 Dorset County Council acknowledges that there are many unknowns regarding the true impact on visitors during the construction phase. However, the Council is concerned as to the comparability of impact studies from other UK offshore sites which suggest limited negative impacts on visitor numbers. Dorset is a south coast holiday area where beach and coastal activities are significant, and particularly for Purbeck, there is huge significance attached to the World Heritage Site and Area of Outstanding Natural Beauty status.
- 5.5.20 The visitor surveys found that 14% of summer visitors and 6% of spring visitors agreed or strongly agreed that they were likely to be put off the area and visit elsewhere during the operational phase. 14% and 4% respectively said the proposed wind park was likely to shorten the amount of time they would want to spend in the area.
- 5.5.21 Applying these percentages of those likely to be put off visiting to visitor spend suggests a potential loss of £52-121 million in the whole Bournemouth/Poole/Christchurch/Purbeck area; with £10-23 million of this relating to Purbeck.
- 5.5.22 Once again it is difficult to be certain of the true impact upon visitor behaviour, but the Council is concerned that other UK off shore sites are not comparable to Dorset. Research evidence from France²² suggests that older, domestic visitors motivated by landscape and nature are those most likely to be deterred. Visitors to the Dorset and East Devon World Heritage Site are most likely to be British, aged 45+, motivated significantly by seaside, beaches, coast and scenery, countryside and natural beauty.²³
- 5.5.23 The Council notes the proposal by Navitus Bay Development Limited to mitigate against possible adverse impacts on tourism by committing funds to promote local tourism and the installation or enhancement of visitor attractions to provide accurate information. Should such mitigation measures be required, the Council would expect to see investment proportionate to the special international setting of the Dorset Coast, reflecting the significance of the sector to the local economy, and acknowledging the particular concerns of Purbeck businesses.

²² 'The case for off shore wind farms, artificial reefs and sustainable tourism in the French Mediterranean', 2011-12, Westerberg, Jacobsen, Lifran

²³ The Jurassic Coast World Heritage Site Visitor Survey, 2004, The Market Research Group

5.6 HIGHWAY CONSIDERATIONS

- 5.6.1 The County Highway Authority has been engaged in dialogue with the project Developer and highway consultants for Navitus Bay for nearly two years, to assess, agree and mitigate the potential highway impacts resulting from the construction, operation and decommissioning phases of the proposed Wind Park, should it go ahead.
- 5.6.2 The Highway Authority is satisfied that the submitted information is both satisfactory and robust. The short term impacts of the proposal can be mitigated satisfactorily by the use of traffic management measures and the highway network has sufficient capacity to accommodate the proposed construction traffic. In the long term, upon completion of the Project should it be allowed, the highway impact is considered to be negligible.

6. ADDITIONAL ISSUES AND IMPACTS

6.1 OFFSHORE ORNITHOLOGY

6.1.1 The Examining Authority is asked to investigate thoroughly the issues of bird migration/strike. It is recognised that NBDL has taken on board a number but not all of the concerns the Council raised at the PEI3 stage.

6.2 OFFSHORE RECREATION

6.2.1 In general NBDL have identified the main receptors in terms of recreational activities likely to be impacted by the development. An exception is for boat angling, where there is little mention of the impacts of fish avoidance of the area and the potential impact on angling experience. The main focus is on obstruction to particular marks.

6.2.2 Noise is likely to be a significant impact for the recreational diving industry as a constant drilling or piling noise, even at great distance from the development site, is likely to put divers off visiting the area. The Outline Diver Management Plan goes some way to mitigating against potential impacts. However, the suggested mitigation for some other impacts might include drilling and piling 24 hours a day. With little noise abatement over the period of construction there is a real potential for significant and long lasting adverse effects on recreational diving and the reputation of Dorset as being an excellent place to carry out this activity.

7. IMPACT OF PROPOSED ARTICLES, REQUIREMENTS AND OBLIGATIONS WITHIN THE DRAFT DEVELOPMENT CONSENT ORDER

Development Consent Order

- 7.1.1 The County Council has a number of comments in relation to the Draft Order which are set out below.
- 7.1.2 Article 7 allows the transfer of the Order benefit to a third party with the Secretary of State's approval. However, this Article should also expressly provide that the duties, obligations and requirements contained in the DCO attach to any such transferee. In addition, the powers in the DCO relating to Street Works (Article 15), Public Rights of Way (Article 16), Temporary Stopping-up of Streets (Article 17) and Access to Work (Article 18) should also be expressly stated to be for the benefit of NBDL or the transferee only.
- 7.1.3 A number of the powers contained in the DCO are subject to control by Requirements. The relevant Articles should state expressly that the powers are subject to and to be exercised in accordance with the relevant Requirements. For example;
- Public Rights of Way – Article 16 and Requirement 12.
 - Highway Accesses (Article 18 and Requirement 11)
 - Works to Trees and Hedgerows (Articles 38 and 39 and Requirements 13, 16, 18, 21 and 29)
- 7.1.4 The compulsory purchase and temporary use powers should be slightly amended. In Article 26(2) NBDL should be required to purchase a greater interest in the land where its acquisition of a right or covenant renders the land incapable of beneficial use. In addition, the notice period in Article 32(3) should be 28 days rather than 14 days.
- 7.1.5 There are a number of important trees in Dorset which are not protected by a TPO. That is because they are not in urban areas. Therefore Article 8 (which appears to duplicate Article 38) and Article 38 should be amended to allow for the protection of these important trees. For example a Requirement should be added to allow for any trees not subject to a TPO but which are nevertheless important to be identified before works are carried out and for those trees to be protected. For example at Broadleaved Copse and Old Hedge Bank, directional drilling for the cables should be used to retain these key and important landscape features. Further, there is an important bog system immediately to the east of the A338 crossing which should be protected by the imposition of an appropriate Requirement.

Requirements

- 7.1.6 The County Council has a number of minor amendments which it considers should be made to the Requirements.
1. Requirement 12: Public Rights or Way temporary diversion and closure - The scheme should include details of the width and surfacing of any alternative route.
 2. Requirement 13: Construction environment management plan - A dust management plan, an evasive species management plan and a groundwater management plan should be included in the list of specific plans at Requirement 13(3).
 3. Requirement 18: Ecological Management Plan—
 - a) This should include specific provision requiring directional drilling where necessary
 - b) This should set out how public access, including car parking, to Hurn Forest will be maintained. There is a real risk that closure of car parks and existing access without alternative provision will displace people onto the nearby heathland which has SPA, SAC and Ramsar designations.
 - c) This should also provide specific protection for the bog system immediately east of the A338 crossing which is a SNCI
 4. Requirement 24: Contaminated land management plan - There should be a fall-back provision to provide for a situation where the provisions dealing with contamination do not in fact achieve the desired result. For example, the temporary cessation of work until a scheme to deal with the contamination has been approved and implemented
 5. Requirement 26: Construction Hours - The terms "start-up" and "shut-down" need definition. For example, if it includes start-up of noisy machinery, this could well be intrusive.
 6. There should be a specific Requirement for the submission and approval of a Flood Risk Scheme

DCO Obligation

- 7.1.7 To date, the County Council has only seen a draft Obligation relating to funding of Compulsory Purchase Compensation Claims substantially in the form appended to the Funding Statement (document 4.2) submitted to the Secretary of State. The County Council has already outlined its detailed concerns about the proposed mechanism to NBDL.

7.1.8 In essence these are as follows:

1. The County Council cannot prevent NBDL from submitting a Unilateral Undertaking. However, NBDL cannot require the County Council to do anything whatsoever pursuant to the Unilateral Undertaking. Thus, as drafted the Unilateral Obligation could prohibit the development from ever commencing.
2. The expectation in the Obligation is that the County Council must be satisfied that NBDL have sufficient funds to cover any land compensation claims. Indeed NBDL has stated in terms to the County Council that the purpose of the Obligation is to protect local landowners whose land may be compulsorily purchased. There is therefore a risk that if the funding arrangements provided by NBDL are defective, landowners could seek compensation from the County Council. That is not acceptable.
3. The County Council has no way of knowing whether £15M is sufficient to cover all compensation claims. The Funding Statement contains a bare assertion that NBDL have received advice that the amount is sufficient but there is no evidence to support that assertion.
4. The County Council considers that NBDL or its parent companies should be required to provide an instrument which guarantees the compensation claims can be met before the DCO is made.

7.1.9 The County Council has seen no obligation which provides for mitigation and/or compensation to address the effects of the scheme. If mitigation measures and compensation are to be secured then an appropriate DCO obligation must be in place before the Order is made. Without such an obligation, there is no mechanism for securing mitigation and compensation measures.

8. APPENDICES

APPENDIX A: COMPARISON OF ASSESSMENT OF VISUAL IMPACT EFFECT

The following summarises the landscape and visual effects which are significant to Dorset County Council's interests. Comments are focussed on aspects of the SLVIA where significant effects can be foreseen but it should not be assumed that when no comment is made on an aspect of the SLVIA, the Council is in agreement with the applicant.

This table should be read in conjunction with the following figures in the Environmental Statement, Chapter 13 – Seascape, Landscape and Visual (Document 6.1.2.13); and in the separate document 'A1 Figures and Visualisations'.

- Fig 13.4 Regional Seascape Units
- Fig 13.5 Seascape Character Types
- Fig 13.7a County Landscape Character: Dorset
- Fig 13.9 Viewpoints and Landform
- Fig 13.15 Zone of Theoretical Visibility 8 MW Layout Bareground (West)

Viewpoint/Location	Designation or defined area, etc	SLVIA's assessment of sensitivity (or primary/secondary receptors, for representative VPs)	SLVIA's assessment of scale of effect / magnitude of change	SLVIA's assessment of significance (EIA significant effects underlined)
VP6: Povington Hill (28.2 km)	Dorset AONB, Purbeck Heritage Coast	High	Low	Moderate
Natural England comments	Natural England considers that the magnitude of effect here is more than low and that effects on this viewpoint are significant.			

Viewpoint/Location	Designation or defined area, etc	SLVIA's assessment of sensitivity (or primary/secondary receptors, for representative VPs)	SLVIA's assessment of scale of effect / magnitude of change	SLVIA's assessment of significance (EIA significant effects underlined)
DCC comments	Concur with Natural England that impacts are played down in the SLVIA.			
VP7: Swyre Head (23.1 km)	Dorset AONB, Purbeck Heritage Coast, Jurassic Coast WHS	High	Medium	<u>Major-moderate</u>
Natural England comments	Agree. There is a significant effect at this viewpoint.			
DCC comments	Concur with Natural England.			
VP8: St Aldhelm's Head (19.0 km)	Dorset AONB, , Purbeck Heritage Coast, Jurassic Coast WHS, SWCP	High-medium	Medium	<u>Major-moderate</u>
Natural England comments	Agree. There is a significant effect at this viewpoint.			
DCC comments	Broadly concur with Natural England. Concerned that impacts are played down in the SLVIA and that sensitivity should be High.			
VP9: Durlston Castle (14.4 km)	Dorset AONB, Purbeck Heritage Coast, Jurassic Coast WHS, SWCP	High-medium	High-medium	<u>Major-moderate</u>
Natural England comments	We have difficulty in understanding the reasoning for the sensitivity of receptors not to be high at the viewpoint which is designated as an AONB, Heritage Coast, WHS, National Trail, a heritage asset and a specific location			

Viewpoint/Location	Designation or defined area, etc	SLVIA's assessment of sensitivity (or primary/secondary receptors, for representative VPs)	SLVIA's assessment of scale of effect / magnitude of change	SLVIA's assessment of significance (EIA significant effects underlined)
	where visitor come to enjoy sea views. At 14.4 km it is the closest point to the scheme and it is inconsistent to have a lower magnitude of change compared to Hurst Castle at 23 km distance. Natural England considers that effects on visual receptors at this specific viewpoint will be Major.			
DCC comments	Concur with Natural England and have concerns that impacts are played down in the SLVIA and that sensitivity should be high.			
VP12: Old Harry Rocks (16.3km)	Dorset AONB, Purbeck Heritage Coast, Jurassic Coast WHS, SWCP	High	Medium	<u>Major-moderate</u>
Natural England comments	Agree. There is a significant effect at this viewpoint (suggest at this angle of view, the magnitude of change should be large).			
DCC comments	Concur with Natural England and have concerns that impacts are played down in the SLVIA.			
VP20: Hengisbury Head (20.4 km)	Scheduled Ancient Monument, Local Nature Reserve & SSSI.	High	Medium-small	Moderate
Natural England comments	N/A			
DCC comments	Concerned that impacts are played down in the SLVIA.			

Viewpoint/Location	Designation or defined area, etc	SLVIA's assessment of sensitivity (or primary/secondary receptors, for representative VPs)	SLVIA's assessment of scale of effect / magnitude of change	SLVIA's assessment of significance (EIA significant effects underlined)
Representative VP5: Hambury Tout (33.8 km)	Dorset AONB, Purbeck Heritage Coast, Jurassic Coast WHS, SWCP	Walkers / visitors	Small	Representative VPs do not receive a final assessment of significance.
Natural England comments	The turbines will be visible extending out into the sea from the headland to the southeast and scale of effect could be higher. In the draft ES PEI 3, effects are considered to be moderate at this viewpoint. The view here has not changed and this would support our concern that collectively moderate impacts on people using the SWCP can occur up to 30 km distance. This is not bought out in the final SLVIA.			
DCC comments	Concur with Natural England.			
Representative VP10: Swanage Seafront (15.8 km)	Dorset AONB, SWCP	Local residents / visitors	Negligible	Representative VPs do not receive a final assessment of significance.
Natural England comments	This viewpoint does not provide a useful representative view of the scheme from Swanage. A viewpoint located further north along the coast would have shown the scheme visible beyond Peveril point and extending across the bay.			
DCC comments	Concur with Natural England.			

Viewpoint/Location	Designation or defined area, etc	SLVIA's assessment of sensitivity (or primary/secondary receptors, for representative VPs)	SLVIA's assessment of scale of effect / magnitude of change	SLVIA's assessment of significance (EIA significant effects underlined)
Representative VP11: Ballard Down (17.0 km)	Dorset AONB, Purbeck Heritage Coast	Walkers / farmers	Large-medium	Representative VPs do not receive a final assessment of significance.
Natural England comments	Agree. The key elements of this view include openness, remoteness and expansiveness and the project would be a foremost feature.			
DCC comments	Broadly concur with Natural England, but consider that there will be a large scale of effect. The SLVIA states that the project 'will create major alterations to the key elements of the view'. It is considered that walkers in this area should be categorised as having high sensitivity, whereas the SLVIA considers walkers to have high-medium sensitivity.			
Representative VP13: Knoll Beach (18.7 km)	Dorset AONB, Purbeck Heritage Coast, SWCP	Visitors / walkers	Negligible	Representative VPs do not receive a final assessment of significance.
Natural England comments	This is not a useful representation of views from Studland. Scenic, long views towards Old Harry Rocks are available further north of this point. Significant visual effects are likely to arise in views representative of recreational receptors on the beaches to the north and people at the start/end of the SWCP National Trail. At this point the turbines will be seen in context of Old Harry Rocks in a similar way to the view from 27. Hurst Castle, where they are seen in the context of the Needles (at a greater distance).			
DCC comments	Concur with Natural England.			

Viewpoint/Location	Designation or defined area, etc	SLVIA's assessment of sensitivity (or primary/secondary receptors, for representative VPs)	SLVIA's assessment of scale of effect / magnitude of change	SLVIA's assessment of significance (EIA significant effects underlined)
Representative VP14: Sandbanks Ferry Port (21 km)	Purbeck Heritage Coast	Travelling public – car users / Travelling public – foot passengers & visitors	Small	Representative VPs do not receive a final assessment of significance.
Natural England comments	N/A			
DCC comments	The ferry is frequently used by visitors, who commonly alight from their vehicles and enjoy the views during the crossing. Additional manmade infrastructure in the viewshed of an already busy area (in the summer in particular) will add to the cumulative visual impact from this sensitive receptor. Therefore the Council is concerned that impacts are played down in the SLVIA.			

Viewpoint/Location	Designation or defined area, etc	SLVIA's assessment of sensitivity (or primary/secondary receptors, for representative VPs)	SLVIA's assessment of scale of effect / magnitude of change	SLVIA's assessment of significance (EIA significant effects underlined)
Representative VP15: Sandbanks Beach (21.2 km)	Blue Flag Beach	Visitors / local residents	Medium	Representative VPs do not receive a final assessment of significance.
Natural England comments	N/A			
DCC comments	Concerned that impacts are played down in the SLVIA.			
Representative VP21: Mudford Quay (21.4 km)	Conservation Area	Visitors / recreational sailors	Medium	Representative VPs do not receive a final assessment of significance.
Natural England comments	N/A			
DCC comments	Concerned that impacts are played down in the SLVIA.			
Representative VP22: Wharnclyff Rd Car Park/ Café (23 km)		Local residents / visitors	Medium	Representative VPs do not receive a final assessment of significance.
Natural England comments	N/A			
DCC comments	Concerned that impacts are played down in the SLVIA.			

Viewpoint/Location	Designation or defined area, etc	SLVIA's assessment of sensitivity (or primary/secondary receptors, for representative VPs)	SLVIA's assessment of scale of effect / magnitude of change	SLVIA's assessment of significance (EIA significant effects underlined)
Dorset AONB: Area A - Coast and coastal fringe from Old Harry Rocks to St. Aldhelm's Head	Dorset AONB, Purbeck Heritage Coast, Jurassic Coast WHS, SWCP	High	Medium	<u>Major-moderate</u>
Natural England comments	The SLVIA identifies a localised significant effect (major – moderate) on the coastline between St Aldhelm's Head and Old Harry Rocks, which form a section of the Dorset AONB, Heritage Coast and Jurassic Coast World Heritage Site. Paragraph 13.805 of the Environmental Statement refers to the "exceptional undeveloped coastline renowned for its spectacular scenery," referenced in the AONB special qualities. This is an accurate judgement.			
DCC comments	Broadly concur with Natural England. There will be an EIA significant effect on Area A. Within localised assessments (e.g. landscape and seascape character areas) the Council considers numerous assessments of landscape, seascape and visual effects within this Area have been under assessed by the SLVIA. The significant adverse effects in this Area extend to the presentation and experience of the WHS.			

Viewpoint/Location	Designation or defined area, etc	SLVIA's assessment of sensitivity (or primary/secondary receptors, for representative VPs)	SLVIA's assessment of scale of effect / magnitude of change	SLVIA's assessment of significance (EIA significant effects underlined)
Dorset AONB: Area B - Poole Harbour and Studland	Dorset AONB, Purbeck Heritage Coast, Jurassic Coast WHS, SWCP	High	Small	Moderate
Natural England comments	Natural England consider that the level of effect on the Dorset AONB is greater than solely limited to the Old Harry Rocks to St. Aldhelm's sub area A but also includes Area B (Poole Harbour and Studland) of the AONB and Heritage Coast where the coastal views out to sea and to Old Harry Rocks are critical to character and designation (exceptional coastline). Here the development will be seen in combination with Old Harry Rocks.			
DCC comments	Broadly concur with Natural England. There will be significant effects on the AONB, affecting Studland Beach and recognised and promoted viewpoints on Brownsea Island. The development will adversely affect the appreciation of coastal scenery and important susceptible Special Qualities of the AONB. This significant effect will extend to the presentation of the WHS.			

Viewpoint/Location	Designation or defined area, etc	SLVIA's assessment of sensitivity (or primary/secondary receptors, for representative VPs)	SLVIA's assessment of scale of effect / magnitude of change	SLVIA's assessment of significance (EIA significant effects underlined)
Dorset AONB: Area C - Coast and coastal fringe from St. Aldhelm's Head to Worbarrow Tout	Dorset AONB, Purbeck Heritage Coast, Jurassic Coast WHS, SWCP	High	Small - negligible	Minor
Natural England comments	Natural England consider that the level of effect on the Dorset AONB is greater than solely limited to the Old Harry Rocks to St. Aldhelm's sub area A but also includes Area D (St. Aldhelm's Head to Worbarrow Tout). There are also exceptional coastal views from the coastal edge and inland chalk ridge from this area which encompass the development which form this area will be seen floating 'above' St Aldhelm's changing perceptions and sense of scale.			
DCC comments	Concur with Natural England. The development will adversely affect the appreciation of coastal scenery and important susceptible Special Qualities of the AONB. This significant effect will extend to the presentation of the WHS.			

Viewpoint/Location	Designation or defined area, etc	SLVIA's assessment of sensitivity (or primary/secondary receptors, for representative VPs)	SLVIA's assessment of scale of effect / magnitude of change	SLVIA's assessment of significance (EIA significant effects underlined)
Dorset AONB: Area E - Inland on the Purbeck Ridgeway	Dorset AONB, Purbeck Heritage Coast	High	Small	Moderate
Natural England comments	Natural England agrees that the inland part of the Dorset AONB where the special quality of exceptional undeveloped coastline is not experienced, will not be affected by the development. However, Natural England does consider there to be a significant visual effect on an assessed location on the Purbeck Ridge, this being VP6 Povington Hill and a significant landscape effect on the Chalk Ridge / Escarpment (Purbeck Ridge) landscape character area between Ballard Down and Old Harry Rocks.			
DCC comments	There will be significant effects on areas of coastal character in the eastern portion of the Purbeck Ridge and on the <i>panoramic views</i> Special Quality that is strongly expressed by the Purbeck Ridge. Panoramic views are a key characteristic of the Ridge, as identified by the Dorset AONB Landscape Character Assessment. Although there is a degree of uncertainty regarding the magnitude of change affecting elevated locations along the ridge in its central section, it is considered that the overall combination of effects on the Ridge is likely to be significant in totality.			

Viewpoint/Location	Designation or defined area, etc	SLVIA's assessment of sensitivity (or primary/secondary receptors, for representative VPs)	SLVIA's assessment of scale of effect / magnitude of change	SLVIA's assessment of significance (EIA significant effects underlined)
Dorset AONB: Overall Assessment		High	Low - very low	Minor
Natural England comments	The assessment of the geographical spread of the impact on sections of Dorset AONB and Purbeck Heritage Coast (part of this area coincides with the Dorset and East Devon 'Jurassic Coast' World Heritage Site) is underestimated. It is Natural England's advice that the spread of significant impacts on these designated landscapes will be greater than those concluded in the SLVIA.			
DCC comments	The development would weaken the AONB to an unacceptable degree. There will be significant effects experienced within Areas A, B, C and E. The overall effect on the AONB is not adequately identified by the SLVIA.			
Purbeck Heritage Coast		High	Low	Moderate
Natural England comments	The assessment of the geographical spread of the impact on sections of Dorset AONB and Purbeck Heritage Coast (part of this area coincides with the Dorset and East Devon 'Jurassic Coast' World Heritage Site) is underestimated. It is Natural England's advice that the spread of significant impacts on these designated landscapes will be greater than those concluded in the SLVIA.			
DCC comments	Comments on the Heritage Coast closely follow those regarding the Dorset AONB. However, comments regarding Area E do not apply where there is no overlap with the Heritage Coast.			

Viewpoint/Location	Designation or defined area, etc	SLVIA's assessment of sensitivity (or primary/secondary receptors, for representative VPs)	SLVIA's assessment of scale of effect / magnitude of change	SLVIA's assessment of significance (EIA significant effects underlined)
Limestone Plateau (Purbeck Plateau) landscape character area	Dorset AONB, Purbeck Heritage Coast, Jurassic Coast WHS, SWCP	High-Medium	Medium	Moderate
Natural England comments	<p>This is the LCT which is closest (14.4km) to the proposed development. For the part of the LCT between St. Aldhelm's Head and Durlston Head, the magnitude of effect is considered to be medium with visual effects covering more than half of this part of the LCT, resulting in a moderate effect (not significant). Natural England consider that this part of the coastal landscape will experience a significant effect.</p> <p>Natural England considers that susceptibility should be recorded as high (undue consequences likely to arise) rather than medium and thereby elevating significance of effects to major-moderate.</p>			
DCC comments	Concur with Natural England. Sensitivity should be high.			

Viewpoint/Location	Designation or defined area, etc	SLVIA's assessment of sensitivity (or primary/secondary receptors, for representative VPs)	SLVIA's assessment of scale of effect / magnitude of change	SLVIA's assessment of significance (EIA significant effects underlined)
Chalk Ridge / Escarpment (Purbeck Ridge) landscape character area	Dorset AONB, Purbeck Heritage Coast, SWCP	High-Medium	Medium	Moderate
Natural England comments	<p>This LCT forms the Purbeck Ridge and includes Ballard Down. It is assessed as having an overall high-medium sensitivity. It forms part of the Dorset AONB and Purbeck Heritage Coast. The magnitude of effect is described as medium for the area at Ballard Down and Old Harry Rocks with an overall moderate effect (not significant). Natural England considers that this part of the coastal landscape will experience a significant effect.</p> <p>Natural England considers that susceptibility should be recorded as high (undue consequences likely to arise) rather than medium and thereby elevating significance of effects to major-moderate.</p>			
DCC comments	<p>Broadly concur with Natural England. Sensitivity should be High. There will be wider effects on panoramic views, which are a key characteristic of the area, as identified by the Dorset AONB Landscape Character Assessment. Such panoramic views are a special quality of the AONB.</p>			

Viewpoint/Location	Designation or defined area, etc	SLVIA's assessment of sensitivity (or primary/secondary receptors, for representative VPs)	SLVIA's assessment of scale of effect / magnitude of change	SLVIA's assessment of significance (EIA significant effects underlined)
Bournemouth Bay Regional Seascape Unit	Dorset AONB, Purbeck Heritage Coast, Jurassic Coast WHS, SWCP	Medium (coast and coastal sea portion) Medium-low (offshore portion)	High - medium	Moderate (coast and coastal sea portion) Moderate (offshore portion)
Natural England comments	N/A			
DCC comments	The Council questions the Moderate significance assessment. Sensitivity should be High for the coast and coastal sea portion, recognising the importance of views into, out of, and across the Dorset AONB. Foreseeable significant effects will occur when the development is seen in association with notable coastal scenery, particularly Old Harry Rocks. The development will adversely affect the appreciation of coastal scenery and important susceptible Special Qualities of the AONB. This significant effect will extend to the presentation of the WHS.			

Viewpoint/Location	Designation or defined area, etc	SLVIA's assessment of sensitivity (or primary/secondary receptors, for representative VPs)	SLVIA's assessment of scale of effect / magnitude of change	SLVIA's assessment of significance (EIA significant effects underlined)
Swanage Bay Regional Seascape Unit	Dorset AONB, Purbeck Heritage Coast, Jurassic Coast WHS, SWCP	High-Medium (coast and coastal sea portion) Medium-low (offshore portion)	Medium - low	Moderate (coast and coastal sea portion) Minor (offshore portion)
Natural England comments	N/A			
DCC comments	DCC questions the Moderate significance assessment. Sensitivity should be high for the coast and coastal sea portion, recognising the importance of views into, out of and across the Dorset AONB. By introducing a large scale wind farm into open seaward views, sometimes in association with features of the WHS, significant adverse effect the appreciation of coastal scenery and important susceptible Special Qualities of the AONB will occur. This significant effect will extend to the presentation and experience of the WHS.			

Viewpoint/Location	Designation or defined area, etc	SLVIA's assessment of sensitivity (or primary/secondary receptors, for representative VPs)	SLVIA's assessment of scale of effect / magnitude of change	SLVIA's assessment of significance (EIA significant effects underlined)
Purbeck Coast Regional Seascape Unit	Dorset AONB, Purbeck Heritage Coast, Jurassic Coast WHS, SWCP	High-Medium (coast and coastal sea portion) Medium-low (offshore portion)	High-medium in East Medium-low in west	<u>Major-moderate in east and Moderate in west (coast and coastal sea portion)</u> Moderate in east and minor in west (offshore portion)
Natural England comments	One significant effect is identified for part of one regional seascape unit (Purbeck Coast) which is identified as Major-moderate in the east and Moderate (not significant) in the west. Natural England is pleased to see the elevation in significance for this part of the coast.			
DCC comments	Sensitivity should be High for the coast and coastal sea portion, recognising the importance of views into, out of and across the Dorset AONB. Foreseeable significant effects will occur when the development is seen in association with notable coastal scenery, particularly at St. Aldhelm's Head. The development will adversely affect the appreciation of coastal scenery and important susceptible Special Qualities of the AONB. This significant effect will extend to the presentation of the WHS.			

Viewpoint/Location	Designation or defined area, etc	SLVIA's assessment of sensitivity (or primary/secondary receptors, for representative VPs)	SLVIA's assessment of scale of effect / magnitude of change	SLVIA's assessment of significance (EIA significant effects underlined)
Sandy Beaches Coastal Seascape Character Type		High-Medium (in AONB) and Medium-Low (in urban areas)	Low	Minor (in AONB) and <u>Minor (in urban areas)</u>
Natural England comments	<p>The seascape character types provide a potentially complex baseline since they are not geographically discrete areas and are likely to have widely differing sensitivities depending on their particular location for example different areas of coastal waters or cliffs.</p> <p>The SLVIA identifies no significant effects on any of the coastal seascape character types. This is a surprising result for a development of this scale within the seascape, and significant effects could be expected here. The SLVIA does not provide certainty that such effects will not occur.</p>			
DCC comments	<p>The SLVIA states that 'the open nature of these beaches affords views in which the main focus is commonly the horizon' (13.5.121). This has been used as a factor which increases susceptibility. In the next paragraph (13.5.122) the same type of characteristic is used to indicate a reduction in susceptibility i.e. 'large scale beaches affords expansive open views'. We would therefore query this assessment as the impacts are felt to more severe than stated and concur with Natural England that the generic approach to assessment is unhelpful. Sensitivity should also be High in AONB.</p>			

Viewpoint/Location	Designation or defined area, etc	SLVIA's assessment of sensitivity (or primary/secondary receptors, for representative VPs)	SLVIA's assessment of scale of effect / magnitude of change	SLVIA's assessment of significance (EIA significant effects underlined)
Shingle Beaches & Spits Coastal Seascape Character Type		High - medium	Medium - low	Moderate
Natural England comments	<p>The seascape character types provide a potentially complex baseline since they are not geographically discrete areas and are likely to have widely differing sensitivities depending on their particular location for example different areas of coastal waters or cliffs.</p> <p>The SLVIA identifies no significant effects on any of the coastal seascape character types. This is a surprising result for a development of this scale within the seascape, and significant effects could be expected here. The SLVIA does not provide certainty that such effects will not occur.</p>			
DCC comments	<p>The SLVIA asserts that 'Panoramic views', 'open exposed views' and/or 'the open nature of cliffs with expansive views across the sea from cliffs' are used as factors which decrease susceptibility. This is questioned and the Council feels these are factors which may very well <u>increase</u> susceptibility to the development in question. Concur with Natural England that the generic approach to assessment is unhelpful. Sensitivity should be High in AONB.</p>			

Viewpoint/Location	Designation or defined area, etc	SLVIA's assessment of sensitivity (or primary/secondary receptors, for representative VPs)	SLVIA's assessment of scale of effect / magnitude of change	SLVIA's assessment of significance (EIA significant effects underlined)
Slumped Cliffs Coastal Seascape Character Type		Medium	Medium - low	Moderate
Natural England comments	<p>The seascape character types provide a potentially complex baseline since they are not geographically discrete areas and are likely to have widely differing sensitivities depending on their particular location for example different areas of coastal waters or cliffs.</p> <p>The SLVIA identifies no significant effects on any of the coastal seascape character types. This is a surprising result for a development of this scale within the seascape, and significant effects could be expected here. The SLVIA does not provide certainty that such effects will not occur.</p>			
DCC comments	<p>The SLVIA asserts that 'Panoramic views', 'open exposed views' and/or 'the open nature of cliffs with expansive views across the sea from cliffs' are used as factors which decrease susceptibility. This is questioned and the Council feels these are factors which may very well <u>increase</u> susceptibility to the development in question. Concur with Natural England that the generic approach to assessment is unhelpful. Sensitivity should be High in AONB.</p>			

Viewpoint/Location	Designation or defined area, etc	SLVIA's assessment of sensitivity (or primary/secondary receptors, for representative VPs)	SLVIA's assessment of scale of effect / magnitude of change	SLVIA's assessment of significance (EIA significant effects underlined)
Hard Rock Cliffs Coastal Seascape Character Type		High - medium	Medium - low	Moderate
Natural England comments	<p>The seascape character types provide a potentially complex baseline since they are not geographically discrete areas and are likely to have widely differing sensitivities depending on their particular location for example different areas of coastal waters or cliffs.</p> <p>The SLVIA identifies no significant effects on any of the coastal seascape character types. This is a surprising result for a development of this scale within the seascape, and significant effects could be expected here. The SLVIA does not provide certainty that such effects will not occur.</p>			
DCC comments	<p>The SLVIA asserts that 'Panoramic views', 'open exposed views' and/or 'the open nature of cliffs with expansive views across the sea from cliffs' are used as factors which decrease susceptibility. This is questioned and the Council feels these are factors which may very well <u>increase</u> susceptibility to the development in question. Concur with Natural England that the generic approach to assessment is unhelpful. Sensitivity should be High in AONB.</p>			

Viewpoint/Location	Designation or defined area, etc	SLVIA's assessment of sensitivity (or primary/secondary receptors, for representative VPs)	SLVIA's assessment of scale of effect / magnitude of change	SLVIA's assessment of significance (EIA significant effects underlined)
Intertidal Rock Ledges Coastal Seascape Character Type		High - medium	Low	Minor
Natural England comments	<p>The seascape character types provide a potentially complex baseline since they are not geographically discrete areas and are likely to have widely differing sensitivities depending on their particular location for example different areas of coastal waters or cliffs.</p> <p>The SLVIA identifies no significant effects on any of the coastal seascape character types. This is a surprising result for a development of this scale within the seascape, and significant effects could be expected here. The SLVIA does not provide certainty that such effects will not occur.</p>			
DCC comments	<p>This section of the SLVIA uses the argument that 'due to the low elevation of the SCT, the project would appear less prominent on the horizon'. This implies that from higher elevations, such as cliffs, the project would be more prominent. This is in direct conflict with the argument used above that 'elevated/open/panoramic views' help to reduce susceptibility. It is also in conflict with the argument that the 'open nature of the <i>Sandy beaches</i> affords views in which the main focus is commonly the horizon'. Concur with Natural England that the generic approach to assessment is unhelpful. Sensitivity should be High in AONB.</p>			

Viewpoint/Location	Designation or defined area, etc	SLVIA's assessment of sensitivity (or primary/secondary receptors, for representative VPs)	SLVIA's assessment of scale of effect / magnitude of change	SLVIA's assessment of significance (EIA significant effects underlined)
Coastal Waters Marine Seascape Character Type	Dorset AONB, Purbeck Heritage Coast, Jurassic Coast WHS	High-medium	Area 1: Medium-low Area 2: Medium-low	Area 1: Moderate Area 2: Moderate
Natural England comments	The SLVIA identifies no significant effects on any of the coastal seascape character types. This is a surprising result for a development of this scale within the seascape, and significant effects could be expected here. The SLVIA does not provide certainty that such effects will not occur.			
DCC comments	Area 1 has High sensitivity. There are fine views along the Purbeck Coast. The development will adversely affect the appreciation of coastal scenery within Area 1. This significant effect will extend to the presentation of the WHS.			

Viewpoint/Location	Designation or defined area, etc	SLVIA's assessment of sensitivity (or primary/secondary receptors, for representative VPs)	SLVIA's assessment of scale of effect / magnitude of change	SLVIA's assessment of significance (EIA significant effects underlined)
Active Coastal Waters Marine Seascape Character Type	Dorset AONB, Purbeck Heritage Coast, Jurassic Coast WHS	Medium	Bournemouth/Christchurch Bay: Medium West towards Weymouth: Low	Bournemouth/Christchurch Bay: Moderate West towards Weymouth: Minor
Natural England comments	N/A			
DCC comments	Active coastal waters toward Bournemouth Bay contain areas of high sensitivity, due to views into and across the AONB. From such locations the development will significantly adversely affect the appreciation of coastal scenery. This significant effect will extend to the presentation of the WHS.			
Inshore Waters Marine Seascape Character Type		Medium-low	Medium	Moderate
Natural England comments	There are no significant effects on any of the coastal seascape character types. This is a surprising result for a development of this scale within the seascape, and significant effects could be expected here. The SLVIA does not provide certainty that such effects will not occur.			
DCC comments	Concerned that impacts are played down in the SLVIA.			

Viewpoint/Location	Designation or defined area, etc	SLVIA's assessment of sensitivity (or primary/secondary receptors, for representative VPs)	SLVIA's assessment of scale of effect / magnitude of change	SLVIA's assessment of significance (EIA significant effects underlined)
South West Coast Path		High - medium	Medium	<u>Major - moderate between Studland and Egmont Point</u>
Natural England comments	<p>The SLVIA identifies a significant (major-moderate) effect on a part of the trail between Studland to Egmont Point, just west of St. Aldhelm's Head with the greatest effect at Durlston and diminishing westwards. This section of the trail passes through the Dorset AONB, Purbeck Heritage Coast and Jurassic Coast WHS. Natural England considers that a sequence of moderate impacts westwards along the trail from this distance should also be recorded as significant.</p> <p>The Natural England site visit confirmed that there will be significant effects at the eastward start/end of the trail (Knoll Beach), where the turbines will be seen in the context of Old Harry Rocks.</p>			
DCC comments	<p>The SLVIA has under assessed the sensitivity of users of the South West Coast Path. The adopted approach does not accord with the principles established within the Guidelines for Landscape and Visual Impact Assessment.</p> <p>There will be significant adverse effects on users of the South West Coast Path between Studland and Gad Cliff, east of Worbarrow Bay. As the Path is a key route from which the WHS is accessed and appreciated, it should be considered that these significant effects extend to the presentation of the Site.</p>			

Viewpoint/Location	Designation or defined area, etc	SLVIA's assessment of sensitivity (or primary/secondary receptors, for representative VPs)	SLVIA's assessment of scale of effect / magnitude of change	SLVIA's assessment of significance (EIA significant effects underlined)
Night time effects - VP9: Durlston Castle	Dorset AONB, Purbeck Heritage Coast, Jurassic Coast WHS, SWCP	High – medium	Medium – low	Moderate
Natural England comments	The assessment does not consider how the lighting would impact on the special qualities of the AONB. Dark night skies are recorded as a special quality contributing to the natural beauty of the AONB. The views out to sea are one of the key locations to appreciate dark skies.			
DCC comments	Concur with Natural England. There will be a significant effect, as the lighting will alter perceptions of an undeveloped coast, through alterations to the night sky.			